



## General Inquiry



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Events

Dockets

Fields

Notes

Disposition

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## Docket Search

2001 CR 00794 STATE OF OHIO -VS- JACKSON, NATHANIEL E JMS

### Search Criteria

Docket Desc.

ALL

Begin Date

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End Date

☐ Ascending

☒ Descending

### Search Results

First 100 of result set displayed, Please limit search criteria.

Docket Date	Docket Text	Amount	Amount Due	Images
01/29/2007	POSTAGE	2.34	2.34	
01/23/2007	STATES RESPONSE TO DEFT JACKSON'S MOTION TO DISQUALIFY THE OFFICE OF THE TRUMBULL COUNTY PROSECUTING ATTY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00	
01/22/2007	CONTINUANCE GRANTED TO RESPOND TO DEFT'S MOTION TO DISQUALITY THE PROS. OFFICE IS GRANTED UNTIL JAN 24 2007. 1-22-07 COPIES TO A. CONSOLDANE, R. PORTER, J. LEWIS, J. LACZKO, D LAGER AND PROS.	2.00	2.00	
12/26/2006	JUDGMENT ENTRY ON THE DEFTS 12-8-06 MOTION FOR CLARIFICATION. SEE JE	2.00	2.00	
12/01/2006	ORDERED THAT THE AFFIDAVIT OF DISQUALIFICATION IS DENIED	1.56	1.56	
10/27/2006	NATHANIEL JACKSON'S CORRECTED REPLY IN SUPPORT OF HIS MOTION FOR RELIEF FROM	0.00	0.00	

	JUDGMENT WITH SERVICE FILED BY ATTY RANDALL PORTER		
10/26/2006	NATHANIEL JACKSON'S REPLY IN SUPPORT OF HIS MOTION FOR RELIEF FROM JUDGMENT WITH SERVICE FILED BY ATTY RANDALL PORTER	0.00	0.00
10/19/2006	STATES ANSWER TO DEFTS MOTION FOR RELIEF FROM JUDGMENT WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/10/2006	NATHANIEL JACKSON'S APPLICATION FOR DISQUALIFICATION OF TRUMBULL COUNTY COMMON PLEAS JUDGE JOHN M STUARD WITH SERVICE FILED BY ATTY RANDALL PORTER ALONG WITH LETTER FROM SUPREME COURT OF OHIO STATING THAT THIS APPLICATION WAS FILED AT THE SUPREME COURT - CASE NO 06AP102	0.00	0.00
10/05/2006	NATHANIEL JACKSON'S REPLY TO MOTION FOR RECUSAL WITH SERVICE FILED BY ATTY RANDALL PORTER	0.00	0.00
10/04/2006	MOTION TO CONTINUE WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
09/27/2006	STATES ANSWER TO DEFTS MOTION FOR RECUSAL OF JUDGE STUARD WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
09/20/2006	NOTICE	0.00	0.00
09/20/2006	NATHANIEL JACKSON'S MOTION TO DISQUALIFY THE OFFICE OF THE TRUMBULL COUNTY PROSECUTING ATTORNEY FILED BY THE DEFENDANT'S ATTORNEY RANDALL PORTER	0.00	0.00
09/19/2006	POSTAGE - 09/22/06 COPIES SENT TO PROS, A.CONSDANE, R.PORTER, J.LEWIS & J.LACZKO	1.95	1.95
09/19/2006	STATES MOTION TO ENTEND TIME TO FILE ITS RESPONSE IS GRANTED. STATES RESPONSE IS DUE BY OCTOBER 19, 2006.	0.00	0.00
09/13/2006	MOTION TO EXTEND TIME TO FILE REPSONSE WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
09/13/2006	NOTICE FILE REQUESTED BY JUDGE STUARD FROM CLERK'S OFFICE	0.00	0.00

09/13/2006	NATHANIEL JACKSON'S MOTION FOR RECUSAL WITH SERVICE FILED BY ATTY RANDALL PORTER	0.00	0.00
09/05/2006	NATHANIEL JACKSON'S MOTION FOR RELIEF FROM JUDGMENT WITH SERVICE FILED BY ATTY RANDALL PORTER	0.00	0.00
08/25/2006	STATES RESPONSE TO DEFTS REQUEST FOR LEAVE TO FILE A MOTION FOR NEW SENTENCING HEARING WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
08/15/2006	REQUEST FOR LEAVE TO FILE HIS MOTION FOR A NEW SENTENCING HEARING FILED BY THE DEFENDANT'S ATTORNEY RANDALL PORTER	0.00	0.00
05/30/2006	1097/689 MANDATE FROM COURT OF APPEALS Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
03/07/2006	1088/969 MANDATE FROM COURT OF APPEALS - JUDGMENT OF TRIAL COURT IS AFFIRMED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/26/2006	1084/622 ORDER FROM THE SUPREME COURT OF OHIO RE MOTION FOR STAY IS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/24/2006	1084/393 OPINION OF THE SUPREME COURT OF OHIO (SEE JE) Amount Owed: \$76.00 Paid Before Conversion: \$0.00 Receipt Number:	76.00	76.00
06/30/2005	POSTAGE Amount Owed: \$1.85 Paid Before Conversion: \$0.00 Receipt Number:	1.85	1.85
06/29/2005	1064/918 MOTION FOR APPOINTMENT OF OCUNSEL IS GRANTED. ATTY DENNIS LAGER IS APPOINTED AS COUNSEL. THIS ORDER IS EFFECTIVE NUNC PRO TUNC TO FEBRUARY 6, 2003. 6/30/05 COPIES: PROSECUTOR, A CONSOLDANE, J LEWIS, J LACZKO, R PORTER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
08/30/2004	POSTAGE Amount Owed: \$1.85 Paid Before Conversion: \$0.00 Receipt	1.85	1.85

Number:		
08/30/2004	1039/809 DEFTS MOTION FOR LEAVE OF COURT TO CONDUCT DISCOVERY RENDERED MOOT. SEE FINDINGS OF FACT FILED ON 6/14/04. 8/31/04 COPIES SENT TO: PROSECUTOR, A CONSOLDANE, J LEWIS, J LACZKO & R PORTER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
07/12/2004	NOTICE OF APPEAL TO THE ELEVENTH DISTRICT COURT OF APPEALS FILED BY ATTY RANDALL PORTER	0.00 0.00
06/18/2004	NATHANIEL JACKSON'S MOTION REQUESTING THE COURT NOT DELEGATE ITS JUDICIAL FUNCTION TO THE PREVAILING PARTY IN DRAFTING FINDINGS OF CACT AND CONCLUSIONS OF LAW FILED BY RANDALL L PORTER ASSISTANT STATE PUBLIC DEFENDER	0.00 0.00
06/14/2004	1032/878 FINDINGS OF FACT AND CONCLUSIONS OF LAW DISMISSING PETITIONER'S ORIGINAL AND AMENDED PETITION FOR POST CONVICTION RELIEF. IT IS ORDERED THAT PETITIONER'S PETITION TO VACATE OR SET ASIDE SENTENCE IS DISMISSED WITHOUT A HEARING. Amount Owed: \$66.00 Paid Before Conversion: \$0.00 Receipt Number:	66.00 66.00
06/14/2004	NATHANIEL JACKSON'S MOTION FOR LEAVE OF COURT TO CONDUCT DISCOVERY FILED BY THE DEFENDANT'S ATTORNEY RANDALL L PORTER ASSISTANT STATE PUBLIC DEFENDER	0.00 0.00
06/10/2004	FILE SENT UP TO JUDGE JOHN M STUARD ON 6-10-04	0.00 0.00
06/02/2004	NATHANIEL JACKSON'S APPENDIX TO HIS MEMORANDUM CONTRA TO THE PROSECUTOR'S MOTION TO DISMISS FILED BY THE OHIO PUBLIC DEFENDER ATTORNEY DAVID BODIOKER	0.00 0.00
05/27/2004	NATHANIEL JACKSON'S FIRST NOTICE OF ADDITIONAL AUTHORITY IN SUPPORT OF HIS MEMORANDUM CONTRA FILED BY ATTORNEY RANDALL PORTER	0.00 0.00



	ASSISTANT STATE PUBLIC DEFENDER		
05/20/2004	NATHANIEL JACKSON'S MEMORANDUM CONTRA TO THE PROSECUTOR'S MOTION TO DISMISS FILED BY THE THE DEFENDANT'S ATTORNEY	0.00	0.00
05/13/2004	1030/743 THE DUE DATE FOR NATHANIEL JACKSON'S REPLY TO THE STATE'S MOTIONS TO DISMISS AT 5/20/04. SEE J/E. Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
05/13/2004	NATHANIEL E JACKSON'S OTION TO GRANT HIM UNTIL MAY 20 2004 IN WHICH TO RESPOND TO THE STATE'S MOTION TO DISMISS FILED THE DEFENDANT'S ATTORNEY RANDALL PORTER ASSISTANT STATE PUBLIC DEFENDER	0.00	0.00
04/27/2004	POSTAGE Amount Owed: \$1.85 Paid Before Conversion: \$0.00 Receipt Number:	1.85	1.85
04/27/2004	1029/415 ORDER FOR DEFENDANT NATHANIEL JACKSON'S MOTION FOR APPOINTMENT OF COUNSEL GRANTED. COURT APPOINTS ASSISTANT STATE PUBLIC DEFENDER RANDALL L PORTER. ORDER IS EFFECTIVE NUN PRO TUNC TO JULY 9, 2003. 4/27/04 COPIES SENT TO: A CONSOLDANE, J LEWIS, J LACZKO, R PORTER, PROSECUTOR Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
04/23/2004	NATHANIEL JACKSON'S MOTION TO GRANT HIM UNTIL MAY 20 2004 IN WHICH TO RESPONSE TO THE STATE'S MOTION TO DISMISS FILED BY THE DEFENDANT'S ATTORNEY RANDALL L PORTER OFFICE OF THE OHIO PUBLIC DEFENDER	0.00	0.00
04/22/2004	MOTION FOR APPOINTMENT OF COUNSEL FILED BY ATTORNEY RANDALL L PORTER ASSISTANT STATE PUBLIC DEFENDER OF THE OHIO PUBLIC DEFENDER	0.00	0.00
04/13/2004	MOTION TO DISMISS AMENDED PETITION FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00

03/31/2004	POSTAGE Amount Owed: \$1.11 Paid Before Conversion: \$0.00 Receipt Number:	1.11	1.11
03/31/2004	1027/311 THIS COURT FIXED THE DUE DATE FOR THE STATES RESPONSE BY ANSWER OR MOTION TO PETITIONER'S AMENDED POSTCONVICTION PETITION TO 4/30/04. 3/31/04 COPIES SENT TO: D BODIKER, R PORTER & PROSECUTOR Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
03/30/2004	MOTION FOR ADDITIONAL TIME TO FILE RESPONSIVE PLEADING FILED BY THE PROSECUTOR'S OFFICE ATTORNEY LUWAYNE ANNOS	0.00	0.00
03/30/2004	MOTION TO DISMISS FILED BY THE PROSECUTOR'S OFFICE ATTORNEY LUWAYNE ANNOS	0.00	0.00
03/29/2004	COPY OF NATHANIEL JACKSON'S AMENDED POST-CONVICTION PETITION AND COPY OF VOLUME,I,II EXHIBITS TO NATHANIEL JACKSON'S AMENDED POST-CONVICTION PETITION GIVEN TO THE TRUMBULL COUNTY PROSECUTOR'S OFFICE ON 3-29-04 PERSONAL SERVICE TO LUWAYNE ANNOS	0.00	0.00
03/29/2004	VOLUME I,II EXHIBITS TO NATHANIEL JACKSON'S AMENDED POST-CONVICTION PETITION FILED BY ATTORNEY RANDALL PORTER	0.00	0.00
03/29/2004	NATHANIEL JACKSON'S AMENDED POST-CONVICTION PETITION FILED BY ATTORNEY RANDALL PORTER COUNSEL FOR PETITIONER	0.00	0.00
03/08/2004	POSTAGE Amount Owed: \$1.11 Paid Before Conversion: \$0.00 Receipt Number:	1.11	1.11
03/05/2004	1025/038 THE DATE FOR THE STATES RESPONSE BY ANSWER OR MOTION IS EXTENDED FROM 3/1/04 TO 3/31/04. 3/8/04 COPIES SENT TO: PROSECUTOR, D BODIKER & R PORTER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
02/24/2004	MOTION TO EXTEND TIME TO RESPOND FILED BY THE	0.00	0.00

PROSECUTOR'S OFFICE			
01/21/2004	POSTAGE Amount Owed: \$1.11 Paid Before Conversion: \$0.00 Receipt Number:	1.11	1.11
01/21/2004	1021/395 PURSUANT TO A MOTION BY THE PLAINTIFF-RESPONDENT, THE STATE OF OHIO, AND R.C. 2953.21(D), THIS COURT FIXES THE DUE DATE FOR THE STATE'S RESPONSE BY ANSWER OR MOTION AT 3/1/04. THE STATE, PER MOTION, HAS SHOWN GOOD CAUSE TO EXTEND THE DUE DATE FROM 1/15/04 TO 3/1/04. 1/21/04 COPIES SENT TO: PROSECUTOR, D BODIKER & R PORTER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/14/2004	MOTION TO EXTEND TIME TO REPSOND WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
01/12/2004	COPIES OF NATHANIEL JACKSON POST-CONVICTION PETITION VOLUME 1 & 2 FILED BY THE OFFICE OF THE OHIO PUBLIC DEFENDER GIVEN TO THE TRUMBULL COUNTY PROSECUTOR'S OFFICE ON JANUARY 12 2004	0.00	0.00
01/05/2004	NATHANIEL JACKSON'S POST CONVICTION PETITION VOLUME II FILED BY ATTY RANDALL PORTER	0.00	0.00
01/05/2004	NATHANIEL JACKSON'S POST- CONVICTION PETITION VOLUME 1 FILED BY ATTY RANDALL PORTER	0.00	0.00
07/03/2003	RECORD FILED WITH THE SUPREME COURT OF OHIO. RECORD CONSISTS OF 7 BOXES AND ONE POSTER INCLUDING EVIDENCE,16 VOL TRANSCRIPTS, ORIGINAL PAPERS, AND CERTIFIED COPY OF TRANSCRIPT OF DOCKET AND JOURNAL ENTRIES AND EXHIBIT LIST. CERTIFIED COPIES TO COUNSEL.	0.00	0.00
06/25/2003	TRANSCRIPT OF PROCEEDINGS(16 VOLUMES) FILED BY COURT REPORTER	0.00	0.00
06/25/2003	HERAING FILED BY MARY ANN MILLS OFFICIAL COURT REPORTER EXHIBITS FROM JURY TRIAL	0.00	0.00

	PROCEEDINGS AND MITIGATION		
05/12/2003	1001/428 MOTION FOR EXTENSION OF TIME TO TRANSMIT THE RECORD IS GRANTED AND THE TIME FOR TRANSMITTING THE RECORD IS EXTENDED TO 7/7/03 Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
03/14/2003	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO PROHIBIT REFERENCE TO NATURE ANND CIRCUMSTANCES OF THE OFFENSE AS A FACTOR TO BE CONSIDERED IN MITIGATION OR IN INTRODUCTORY LANGUAGE RESPECTING MITIGATION FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
02/04/2003	993/384 DEFTS MOTION FOR TRANSCRIPTS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/27/2003	NOTICE OF APPEAL OF APPELLANT,NATHANIEL E JACKSON FILED BY THE SUPREME COURT OF OHIO ALSO ORDER TO CERTIFY RECORD IN DEATH PENALTY CASE FILED	0.00	0.00
01/21/2003	991/929 ORDER FOR MARY ANN MILLS, KELLY WILSON AND LORI RITTWADGE, OFFICIAL COURT REPORTERS, PRODUCE COPY OF ALL PROCEEDINGS FOR PURPOSES OF APPEAL. Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/21/2003	MOTION FOR TRANSCRIPTS FILED BY ATTORNEY JOHN LACZKO.	0.00	0.00
01/03/2003	990/462 APPROVAL OF PAYMENT OF EXPERT EXPENSES Amount Owed: \$12.00 Paid Before Conversion: \$0.00 Receipt Number:	12.00	12.00
12/17/2002	POSTAGE Amount Owed: \$0.74 Paid Before Conversion: \$0.00 Receipt Number:	0.74	0.74
12/17/2002	989/424 DEFTS MOTION FOR A NEW TRIAL IS DENIED. SEE J/E. 4/17/02 COPIES SENT TO: PROSECUTOR & A CONSOLIDANE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
12/17/2002	989/422 JUDGMENT ON VERDICT	4.00	4.00

	Amount Owed: \$4.00 Paid Before		
	Conversion: \$0.00 Receipt Number:		
12/17/2002	EXECUTION OF COSTS RETURNED	5.00	5.00
	ENDORSED BY SHERIFF Amount		
	Owed: \$5.00 Paid Before Conversion:		
	\$0.00 Receipt Number:		
12/16/2002	MOTION TO PROVIDE FINDING OF	0.00	0.00
	FACT AND CONCLUSION FILED BY		
	THE DEFENDANT'S ATTORNEY		
12/13/2002	WARRANT RETURNED SHOWING	34.90	34.90
	SERVICE ON DEFENDANT SHERIFF		
	ALTEE Amount Owed: \$34.90 Paid		
	Before Conversion: \$0.00 Receipt		
	Number:		
12/11/2002	989/005 DEFENDANT'S MOTION FOR	2.00	2.00
	NEW TRIAL DENIED. 12/11/02 COPIES		
	SENT: PROSECUTOR, A		
	CONSOLDANE Amount Owed: \$2.00		
	Paid Before Conversion: \$0.00 Receipt		
	Number:		
12/11/2002	989/004 DEFENDANT'S MOTION FOR	2.00	2.00
	PROPORTIONALITY REVIEW IS		
	DENIED. 12/11/02 COPIES SENT"		
	PROSECUTOR, A CONSOLDANE		
	Amount Owed: \$2.00 Paid Before		
	Conversion: \$0.00 Receipt Number:		
12/10/2002	988/878 APPROVAL OF PAYMENT OF	12.00	12.00
	COUNSEL FEES. 12/10/02 CC TO		
	AUDITOR Amount Owed: \$12.00 Paid		
	Before Conversion: \$0.00 Receipt		
	Number:		
12/10/2002	988/877 ORDER ON WARRANT TO	2.00	2.00
	CONVEY Amount Owed: \$2.00 Paid		
	Before Conversion: \$0.00 Receipt		
	Number:		
12/10/2002	988/873 SENTENCING: DECEMBER 9,	8.00	8.00
	2002 - DEFENDANT TO BE TAKEN		
	FROM COURTROOM TO TRUMBULL		
	COUNTY JAIL AND FROM THERE TO		
	CORRECTION RECEPTION CENTER		
	AT LORAIN OHIO AND THEREAFTER		
	SENTENCED TO DEATH ON		
	DECEMBER 10, 2003 ON COUNT ONE;		
	IMPRISONED THEREIN FOR STATED		
	PRISON TERM OF 10 YEARS ON		
	COUNT THREE; PLUS MANDATORY		
	TERM OF 3 YEARS ON FIREARM		
	SPECIFICATION TO BE SERVED		
	PRIOR TO AND CONSECUTIVE TO		
	SENTENCE IMPOSED IN COUNT		
	THREE; 10 YEARS ON COUNT FOUR,		
	PLUS MANDATORY TERM OF 3		

YEARS ON FIREARM  
SPECIFICATION TO BE SERVED  
PRIOR TO AND CONSECUTIVE TO  
SENTENCE IMPOSED IN COUNT  
FOUR, SENTENCE IN COUNT FOUR  
TO BE SERVED CONSECUTIVELY TO  
SENTENCE IMPOSED ON COUNT  
THREE. FIREARM SPECIFICATIONS  
IN COUNT 3 AND COUNT 4 SHALL  
MERGE AS ONE SENTENCE IN  
COUNT 3 AS MATTER OF LAW.  
DEFENDANT TO PAY COSTS.

12/10/02 COPIES SENT:  
PROSECUTOR, A CONSOLDANE,  
SUPREME COURT OF OHIO. Amount  
Owed: \$8.00 Paid Before Conversion:  
\$0.00 Receipt Number:

12/10/2002	EXECUTION FOR COSTS IN FELONY. ISSUED TO SHERIFF ON 12-10-02	0.00	0.00
12/10/2002	WARRANT TO CONVEY TO CORRECTIONAL RECEPTION CENTER ISSUED TO SHERIFF ON 12-10-02	0.00	0.00
12/10/2002	STENOGRAPHER FEE Amount Owed: \$25.00 Paid Before Conversion: \$0.00 Receipt Number:	25.00	25.00
12/10/2002	COMPLETE RECORD Amount Owed: \$20.00 Paid Before Conversion: \$0.00 Receipt Number:	20.00	20.00
12/10/2002	POST SENTENCING RIGHTS FILED BY PROSECUTOR'S OFFICE	0.00	0.00
12/10/2002	MOTION FOR PAYMENT OF EXPERT FEES FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
12/09/2002	988/789 OPINION OF THE COURT - FINDINGS OF FACT AND CONCLUSIONS OF LAW REGARDING IMPOSITION OF DEATH PENALTY Amount Owed: \$24.00 Paid Before Conversion: \$0.00 Receipt Number:	24.00	24.00
11/19/2002	STENOGRAPHER FEE KELLY J WILSON OFFICIAL COURT REPORTER Amount Owed: \$125.00 Paid Before Conversion: \$0.00 Receipt Number:	125.00	125.00
11/18/2002	987/116 COUNT ONE: JURY FINDING AND RECOMMENDATION OF DEATH SENTENCE Amount Owed: \$4.00 Paid Before Conversion: \$0.00 Receipt Number:	4.00	4.00



11/18/2002	SENTENCING HEARING 12/09/2002 10:00 AM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
11/18/2002	HEARING 11/26/2002 01:00 PM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
11/12/2002	986/722 VERDICT FOR PLAINTIFF - SPECIFICATION #1 TO THE FOURTH COUNT OF THE INDICTMENT Amount Owed: \$10.00 Paid Before Conversion: \$0.00 Receipt Number:	10.00	10.00
11/12/2002	986/721 VERDICT FOR PLAINTIFF - COUNT FOUR: INDICTMENT FOR AGGRAVATED ROBBERY Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/720 VERDICT FOR PLAINTIFF - SPECIFICATION #1 TO THE THIRD COUNT OF THE INDICTMENT Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/719 VERDICT FOR PLAINTIFF - COUNT THREE: INDICTMENT FOR AGGRAVATED BURGLARY Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/718 VERDICT FOR PLAINTIFF - SPECIFICATION #2 TO THE SECOND COUNT OF THE INDICTMENT Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/717 VERDICT FOR PLAINTIFF - SPECIFICATION #1 TO THE SECOND COUNT OF THE INDICTMENT Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/716 VERDICT FOR PLAINTIFF - COUNT TWO: INDICTMENT FOR AGGRAVATED MURDER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/715 VERDICT FOR PLAINTIFF - SPECIFICATION #2 TO THE FIRST COUNT OF THE INDICTMENT Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/12/2002	986/714 VERDICT FOR PLAINTIFF - SPECIFICATION #1 TO THE FIRST COUNT OF THE INDICTMENT Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00

11/12/2002	986/713 VERDICT FOR PLAINTIFF. COUNT ONE: INDICTMENT FOR AGGRAVATED MURDER Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
11/08/2002	CERTIFIED MAIL NUMBER 1278833 RETURNED ENDORSED FROM MICHAEL ROBERTS ON 10/29/02 BY KELLY LUMAN	0.00	0.00
11/01/2002	985/837 ORDERED THAT INVESTIGATORS MORRIS HILL AND BEN DIGIOVANNI SHALL RECEIVE, SERVE AND MAKE RETURN OF SUBPEONAS SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
10/31/2002	SUBPOENA RETURNED AND ENDORSED ON TAMMY KAYE BY TRUMBULL COUNTY SHERIFF Amount Owed: \$2.30 Paid Before Conversion: \$0.00 Receipt Number:	2.30	2.30
10/31/2002	SUBPOENA RETURNED AND ENDORSED ON DIANA MARCHESE BY TRUMBULL COUNTY SHERIFF Amount Owed: \$1.00 Paid Before Conversion: \$0.00 Receipt Number:	1.00	1.00
10/31/2002	SUBPOENA RETURNED AND ENDORSED ON DAND HINES BY TRUMBULL COUNTY SHERIFF Amount Owed: \$1.00 Paid Before Conversion: \$0.00 Receipt Number:	1.00	1.00
10/31/2002	SUBPOENA RETURNED BY SHERIFF. NO SERVICE ON SANTIAGO MASON Amount Owed: \$1.00 Paid Before Conversion: \$0.00 Receipt Number:	1.00	1.00
10/31/2002	SUBPOENA RETURNED AND ENDORSED ON SKY BANK BY PROCESS SERVER	0.00	0.00
10/30/2002	SUBPOENA RETURNED BY SHERIFF. UNABLE TO SERVE JANET CLAY IN TIME FOR HEARING Amount Owed: \$1.00 Paid Before Conversion: \$0.00 Receipt Number:	1.00	1.00
10/30/2002	CERTIFIED MAIL NUMBER 1278835 RETURNED ENDORSED FROM BRENDA K GERARDI ON 10/29/02 BY KELLY LUMAN	0.00	0.00
10/30/2002	CERTIFIED MAIL NUMBER 1278834 RETURNED ENDORSED FROM DONNA ROSE ON 10/29/02 BY KELLY LUMAN	0.00	0.00

10/30/2002	MOTION FOR PROCESS SERVER WITH SERVICE FILED BY ATTY ANTHONY CONSOLDANE	0.00	0.00
10/30/2002	SUBPOENA RETURNED AND ENDORSED ON BRAD CAIN ON 10- 30-02	0.00	0.00
10/30/2002	SUBPOENA RETURNED AND ENDORSED ON BMV RECORDS DEPT ON 10-30-02	0.00	0.00
10/29/2002	985/362 JURORS EXCUSED BY COUNSEL Amount Owed: \$18.00 Paid Before Conversion: \$0.00 Receipt Number:	18.00	18.00
10/28/2002	WITNESS FEES FOR JOSE FLORES Amount Owed: \$33.40 Paid Before Conversion: \$0.00 Receipt Number:	33.40	33.40
10/28/2002	SUBPOENA RETURNED AND ENDORSED ON CATHY THOMAS BY HOWLAND PD	0.00	0.00
10/28/2002	SUBPOENA RETURNED AND ENDORSED ON KATHY KIHM BY HOWLAND PD	0.00	0.00
10/28/2002	SUBPOENA RETURNED AND ENDORSED ON BRIDGET PAUL BY WARREN PD	0.00	0.00
10/25/2002	CERTIFIED MAILER NUMBER P 00001278835 SENT TO: BRENDA K GERARDI Amount Owed: \$5.00 Paid Before Conversion: \$0.00 Receipt Number:	5.00	5.00
10/25/2002	CERTIFIED MAILER NUMBER P 00001278834 SENT TO: DONNA ROSE Amount Owed: \$5.00 Paid Before Conversion: \$0.00 Receipt Number:	5.00	5.00
10/25/2002	CERTIFIED MAILER NUMBER P 00001278833 SENT TO: MICHAEL ROBERTS Amount Owed: \$5.00 Paid Before Conversion: \$0.00 Receipt Number:	5.00	5.00
10/24/2002	SUBPOENA RETURNED AND ENDORSED ON JILL KENYON BY SGT FRANK DILLON	0.00	0.00
10/24/2002	SUBPOENA RETURNED AND ENDORSED ON KRIS ELLINGTON BY SGT FRANK DILLON	0.00	0.00
10/24/2002	SUBPOENA RETURNED AND ENDORSED ON JENNIFER ROBISON BY SGT FRANK DILLON	0.00	0.00
10/23/2002	WITNESS FEES FOR FRANK REYNOLDS Amount Owed: \$14.00 Paid	14.00	14.00

	Before Conversion: \$0.00 Receipt Number:		
10/23/2002	WITNESS FEES FOR JAMES C DANIELS Amount Owed: \$28.00 Paid Before Conversion: \$0.00 Receipt Number:	28.00	28.00
10/23/2002	WITNESS FEES FOR PAULA CARSON Amount Owed: \$6.30 Paid Before Conversion: \$0.00 Receipt Number:	6.30	6.30
10/21/2002	STATES TWELFTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/17/2002	STATES ELEVENTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/16/2002	STATES REQUEST FOR JURY VIEW WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/16/2002	STATES TENTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/11/2002	STATES TENTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
10/08/2002	STATES NINTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
09/24/2002	STATES EIGHTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY FILED BY PROSECUTOR	0.00	0.00
09/16/2002	STATES SEVENTH SUPPLEMENTAL REPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
09/11/2002	981/579 DEFTS MOTION FOR SPECIFIC DISCOVERY DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/578 DEFTS MOTION TO REQUIRE THE JURY TO ARTICULATE THE METHOD BY WHICH IT WEIGHS THE AGGRAVATING AGAINST THE MITIGATING CIRCUMSTANCES DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00

09/11/2002	981/577 DEFTS MOTION TO ALLOW FULL STATEMENT OF DEFENSE OBJECTIONS AT TRIAL AND TO REQUIRE A STATEMENT OF REASON FOR OVERRULING SAME ON THE RECORD DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/576 DEFTS MOTION IN LIMINE TO LIMIT THE STATES ARGUMENT AT MITIGATION TO THE AGGRAVATING CIRCUMSTANCES PROVEN AT THE TRIAL PHASE DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/575 DEFTS MOTION FOR DISCLOSURE OF REBUTTAL WITNESSES GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/574 DEFTS MOTION TO PROPERLY PRESERVE AND CATALOG ALL PHYSICAL EVIDENCE DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/573 DEFTS MOTION TO PERMIT DEFT TO APPEAR IN CIVILIAN CLOTHING AT ALL COURT PROCEEDINGS DENIED IN PART AND GRANTED IN PART. SEE J/E Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/572 DEFTS MOTION IN LIMINE TO PROHIBIT DISPLAY OF EXHIBITS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/571 DEFTS MOTION FOR DISCLOSURE OF WITNESS STATEMENTS PRIOR TO TRIAL DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/570 DEFTS MOTION TO EXTEND TIME TO FILE MOTIONS DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/569 DEFTS MOTION FOR DISCLOSURE OF THE TRANSCRIPT OF PROCEEDINGS BEFORE THE	2.00	2.00

GRAND JURY DENIED Amount Owed:  
\$2.00 Paid Before Conversion: \$0.00  
Receipt Number:

09/11/2002	981/568 DEFTS MOTION FOR SEQUESTRATION OF JURORS FOR DURATION OF TRIAL DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/567 DEFTS MOTION TO PERMIT DEFENSE TO ADMIT ALL RELEVANT EVIDENCE AT MITIGATION PHASE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/566 DEFTS MOTION TO PROHIBIT PROSECUTOR FROM COMMENTING ON DEFTS UNSWORN STATEMENT GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/565 DEFTS MOTION FOR A SECOND VOIR DIRE OF THE JURY IF DEFT IS FOUND GUILTY DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/564 DEFTS MOTION FOR A COMPREHENSIVE VOIR DIRE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/563 DEFTS MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/562 DEFTS MOTION FOR A RULE 104 HEARING DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/561 DEFTS MOTION TO RECORD ALL SIDE BAR PROCEEDINGS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/560 DEFTS MOTION IN LIMINE REGARDING OTHER ACTS EVIDENCE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/559 DEFTS VOIR DIRE MEMORANDUM: VENIRE PERSONS	2.00	2.00



WHO CANNOT FAIRLY CONSIDER  
MITIGATING EVIDENCE AND WHO  
WOULD AUTOMATICALLY VOTE  
FOR DEATH UPON A SHOWING OF  
GUILTY MUST BE EXCUSED -  
GRANTED IN PART AND DENIED IN  
PART. SEE J/E Amount Owed: \$2.00  
Paid Before Conversion: \$0.00 Receipt  
Number:

09/11/2002 981/558 DEFTS MOTION TO 2.00 2.00

PROHIBIT REFERENCE TO NATURE  
AND CIRCUMSTANCES OF THE  
OFFENSE AS A FACTOR TO BE  
CONSIDERED IN MITIGATION IS  
GRANTED Amount Owed: \$2.00 Paid  
Before Conversion: \$0.00 Receipt  
Number:

09/11/2002 988/557 MOTION TO INSTRUCT THE 2.00 2.00

JURY THAT IT IS TO WEIGH ONLY  
THE AGGRAVATING  
CIRCUMSTANCES AND NOT THE  
AGGRAVATED MURDER ITSELF  
GRANTED. SEE JE Amount Owed:  
\$2.00 Paid Before Conversion: \$0.00  
Receipt Number:

09/11/2002 981/556 MOTION TO ALTER 2.00 2.00

DEFINTION OF MITIGATING  
CIRCUMSTANCES TO REMOVE  
REFERENCE TO REDUCING THE  
DEGREE OF BLAME AND TO  
REPLACE THIS WITH OTHER  
LANGUAGE AND TO SO LIMIT THE  
PROSECUTOR IN ARGUMENT  
DENIED. SEE JE Amount Owed: \$2.00  
Paid Before Conversion: \$0.00 Receipt  
Number:

09/11/2002 981/555 MOTION IN LIMINE TO 2.00 2.00

PROHIBIT PREJUDICIAL  
ARGUMENTS AND THEMES AT THE  
CLOSING ARGUMENT OF THE  
PENALTY PHASE GRANTED. SEE JE  
Amount Owed: \$2.00 Paid Before  
Conversion: \$0.00 Receipt Number:

09/11/2002 981/554 MOTION TO PROHIBIT THE 2.00 2.00

PROSECUTOR FROM ARGUING AND  
THE COURT FROM GIVING  
INSTRUCTIONS REGARDING  
STATUTORY MITIGATING FACTORS  
NOT RAISED BY THE DEFENSE  
GRANTED. SEE JE Amount Owed:  
\$2.00 Paid Before Conversion: \$0.00  
Receipt Number:

09/11/2002	981/553 MOTION TO PRECLUDE READMISSION OF TRIAL PHRASE EVIDENCE AND EXHIBITS IN THE PENALTY PHRASE AND RELATED PROSECUTORIAL COMMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/552 VOIR DIRE MEMORANDUM:THE DEFENSE MUST BE ALLOWED TO EXAMINE PROSPECTIVE JURORS REGARDING THEIR VIEWS ON CAPITAL PUNISHMENT PRIOR TO THEIR EXCUSAL IS TAKEN UNDER ADVISEMENT. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/551 MOTION FOR INSTRUCTION THAT THE STATE BEARS THE BURDEN OF PROVING THE ABSENCE OF ANY MITIGATING FACTORS OFFERED BY THE DEFENSE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	POSTAGE Amount Owed: \$0.74 Paid Before Conversion: \$0.00 Receipt Number:	0.74	0.74
09/11/2002	981/582 FINDINGS OF FACTS AND CONCLUSIONS OF LAW. DEFTS MOTION TO SUPPRESS IS OVERRULED. SEE J/E. 9/11/02 COPIES SENT TO: PROSECUTOR & A CONSOLDANE Amount Owed: \$30.00 Paid Before Conversion: \$0.00 Receipt Number:	30.00	30.00
09/11/2002	981/550 MOTION TO INSTRUCT THE JURY THAT IT IS TO RETURN A VERDICT OF DEATH ONLY AFTER THE PROPER WEIGHING AND DETERMINING THAT DEATH IS THE APPROPRIATE PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/549 MOTION FOR CLOSURE OF THE PRETRIAL HEARINGS AND TO INSULATE VENIRE AND JURY DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00

09/11/2002	981/548 MOTION IN LIMINE TO EXCLUDE PHOTOGRAPHS OF THE DECEDENTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/547 MOTION TO RESTRAIN PARTIES FROM DISCUSSING THE CASE WITH THE DEFENDANT GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/546 MOTION FOR AN ORDER REGULATING THE TRANSFER OF THE DEFENDANT FROM JAIL TO THE COURTROOM CONTINUED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/545 MOTION TO PROHIBIT THE FILMING, PHOTOGRAPHING OR VIDEOTAPING OF THE DEFENDANT WHILE IN THE COURTROOM IN THE EVENT THE DEFENDANT BECOMES A WITNESS AT TRIAL GRANTED, BUT DENIES DEFENDANTS MOTION TO THE EXTENT THAT THE DEFENDANT IS MERELY PRESENT IN THE COURTEOOM. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/544 MOTION TO INCREASE THE BURDEN OF PROOF TO BEYOND ALL DOUBT IN BOTH THE TRIAL AND SENTENCING PHRASES DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/543 MOTION FOR ALL MOTIONS TO BE HEARD ON THE RECORD GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/542 DEFENDANTS REQUEST FOR RULING ON ALL MOTIONS PRIOR TO COMMENCEMENT OF TRIAL GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/541 MOTION FOR TRANSCRIPTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/540 MOTION FOR AN INCREASE	2.00	2.00

	IN THE NUMBER OF PEREMPTORY CHALLENGES DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:		
09/11/2002	981/539 MOTION FOR AN ALTERNATING VOIR DIRE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/538 MOTION TO REDUCE BIAS IN THE ANNUAL JURY LIST DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/537 MOTION REQUESTING MITIGATING PHASE INSTRUCTIONS ON REMNANT DOUBT ABOUT GUILTY AND MERCY AS MITIGATING FACTORS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/536 MOTION TO PROHIBIT STATE FROM USING PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/535 MOTION TO PROHIBIT DEATH QUALIFICATION OF POTENTIAL JURORS UNLESS AND UNTIL THE PROSECUTION HAS SHOWN PROBABLE CAUSE THAT THE CASE WILL PROCEED TO MITIGATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/534 MOTION TO COMPEL ALL STATE AGENTS TO TURN OVER TO THE PROSECUTING ATTORNEYS AND TO ADVISE THEM OF ALL INFORMATION ACQUIRED DURING THE COURSE OF THE INVESTIGATION OF THIS CASE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/533 MOTION FOR AN ORDER DIRECTING THAT A COMPLETE COPY BE MADE AND TURNED OVER TO THE COURT FOR REVIEW AND TO BE SEALED FOR APPELLATE REVIEW DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion:	2.00	2.00

	\$0.00 Receipt Number:		
09/11/2002	981/532 MOTION FOR PENALTY PHASE JURY INSTRUCTION RESPECTING ORDER OF DELIBERATIONS AND LACK OF NECESSITY TO FIRST AGREE UNANIMOUSLY ON A VERDICT OF DEATH DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/531 MOTION TO PROHIBIT REFERENCES TO THE JURY AT ANY POINT IN THESE PROCEEDINGS THAT A VERDICT AS TO DEATH IS ONLY A RECOMMENDATION IN THE ALTERNATIVE MOTION TO PROHIBIT REFERENCES TO THE BINDING OR NON BINDING NATURE OF THE JURY'S DETERMINATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/530 DEFENDANTS MOTION REGARDING (A) NO COMMENTS ON DEFENSE WITNESS LIST GRANTED. (B) NO COMMENTS ON THE FACT THAT DEFENSE EXPERTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/529 MOTION FOR DISCLOSURE OF ANY AND ALL AGREEMENTS AND OR BENEFITS AND OR DEALS INVOLVING PROSECUTING WITNESSES GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/528 MOTION TO PROHIBIT DEATH QUALIFICATION OF JURY: IN THE ALTERNATIVE, IF NECCESARY, TO SEAT A SEPERATE JURY DURING PENALTY PHASE OF TRIAL DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/527 MOTION TO COMPEL DISCLOSURE OF THE PROSECUTING ATTORNEYS JURY SELECTION DATA DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/526 MOTION TO ALLOW THE DEFENSE TO ARGUE LAST AT THE	2.00	2.00

PENALTY PHASE DENIED. SEE JE  
Amount Owed: \$2.00 Paid Before  
Conversion: \$0.00 Receipt Number:

09/11/2002	981/525 DEFENDANTS MOTION TO HAVE THE COURT FOLLOW THE OHIO REV CODE 2945-25(C) STANDARD FOR DEATH QUALIFICATIONS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/524 DEFENDANTS MOTION TO PROHIBIT THE USE OF PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/523 MOTION TO ALLOW THE DEFENSE TO ARGUE FIRST AND LAST AT THE SENTENCING HEARING DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/522 MOTION TO CHALLENGE THE ARRAY OF THE GRAND JURY AND PETIT JURY DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/521 MOTION FOR A CHANGE OF VENUE CONTINUED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/520 MOTION FOR AUGMENTED UNANIMITY INSTRUCTION FOR CAPITAL SPECIFICATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00





## General Inquiry



New St

Summary

Parties

Events

Dockets

Fields

Notes

Disposition

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## Docket Search

2001 CR 00794 STATE OF OHIO -VS- JACKSON, NATHANIEL E JMS

### Search Criteria

Docket Desc.

ALL

Begin Date

12/01/2001

Sort

End Date

09/11/2002

☐ Ascending☒ Descending

Search

### Search Results

First 100 of result set displayed, Please limit search criteria.

Docket Date	Docket Text	Amount Due	Amount Images
09/11/2002	981/579 DEFTS MOTION FOR SPECIFIC DISCOVERY DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/578 DEFTS MOTION TO REQUIRE THE JURY TO ARTICULATE THE METHOD BY WHICH IT WEIGHS THE AGGRAVATING AGAINST THE MITIGATING CIRCUMSTANCES DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/577 DEFTS MOTION TO ALLOW FULL STATEMENT OF DEFENSE OBJECTIONS AT TRIAL AND TO REQUIRE A STATEMENT OF REASON FOR OVERRULING SAME ON THE RECORD DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/576 DEFTS MOTION IN LIMINE TO LIMIT THE STATES ARGUMENT AT MITIGATION TO THE	2.00	2.00

AGGRAVATING CIRCUMSTANCES  
 PROVEN AT THE TRIAL PHASE  
 DENIED Amount Owed: \$2.00 Paid  
 Before Conversion: \$0.00 Receipt  
 Number:

09/11/2002	981/575 DEFTS MOTION FOR DISCLOSURE OF REBUTTAL WITNESSES GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/574 DEFTS MOTION TO PROPERLY PRESERVE AND CATALOG ALL PHYSICAL EVIDENCE DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/573 DEFTS MOTION TO PERMIT DEFT TO APPEAR IN CIVILIAN CLOTHING AT ALL COURT PROCEEDINGS DENIED IN PART AND GRANTED IN PART. SEE J/E Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/572 DEFTS MOTION IN LIMINE TO PROHIBIT DISPLAY OF EXHIBITS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/571 DEFTS MOTION FOR DISCLOSURE OF WITNESS STATEMENTS PRIOR TO TRIAL DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/570 DEFTS MOTION TO EXTEND TIME TO FILE MOTIONS DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/569 DEFTS MOTION FOR DISCLOSURE OF THE TRANSCRIPT OF PROCEEDINGS BEFORE THE GRAND JURY DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/568 DEFTS MOTION FOR SEQUESTRATION OF JURORS FOR DURATION OF TRIAL DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/567 DEFTS MOTION TO PERMIT DEFENSE TO ADMIT ALL RELEVANT	2.00	2.00

EVIDENCE AT MITIGATION PHASE		
GRANTED Amount Owed: \$2.00 Paid		
Before Conversion: \$0.00 Receipt		
Number:		
09/11/2002	981/566 DEFTS MOTION TO PROHIBIT PROSECUTOR FROM COMMENTING ON DEFTS UNSWORN STATEMENT GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/565 DEFTS MOTION FOR A SECOND VOIR DIRE OF THE JURY IF DEFT IS FOUND GUILTY DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/564 DEFTS MOTION FOR A COMPREHENSIVE VOIR DIRE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/563 DEFTS MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/562 DEFTS MOTION FOR A RULE 104 HEARING DENIED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/561 DEFTS MOTION TO RECORD ALL SIDE BAR PROCEEDINGS GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/560 DEFTS MOTION IN LIMINE REGARDING OTHER ACTS EVIDENCE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/559 DEFTS VOIR DIRE MEMORANDUM: VENIRE PERSONS WHO CANNOT FAIRLY CONSIDER MITIGATING EVIDENCE AND WHO WOULD AUTOMATICALLY VOTE FOR DEATH UPON A SHOWING OF GUILTY MUST BE EXCUSED - GRANTED IN PART AND DENIED IN PART. SEE J/E Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00 2.00
09/11/2002	981/558 DEFTS MOTION TO	2.00 2.00

PROHIBIT REFERENCE TO NATURE  
AND CIRCUMSTANCES OF THE  
OFFENSE AS A FACTOR TO BE  
CONSIDERED IN MITIGATION IS  
GRANTED Amount Owed: \$2.00 Paid  
Before Conversion: \$0.00 Receipt  
Number:

09/11/2002 988/557 MOTION TO INSTRUCT THE JURY THAT IT IS TO WEIGH ONLY THE AGGRAVATING CIRCUMSTANCES AND NOT THE AGGRAVATED MURDER ITSELF GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number: 2.00 2.00

09/11/2002 981/556 MOTION TO ALTER DEFINITION OF MITIGATING CIRCUMSTANCES TO REMOVE REFERENCE TO REDUCING THE DEGREE OF BLAME AND TO REPLACE THIS WITH OTHER LANGUAGE AND TO SO LIMIT THE PROSECUTOR IN ARGUMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number: 2.00 2.00

09/11/2002 981/555 MOTION IN LIMINE TO PROHIBIT PREJUDICIAL ARGUMENTS AND THEMES AT THE CLOSING ARGUMENT OF THE PENALTY PHASE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number: 2.00 2.00

09/11/2002 981/554 MOTION TO PROHIBIT THE PROSECUTOR FROM ARGUING AND THE COURT FROM GIVING INSTRUCTIONS REGARDING STATUTORY MITIGATING FACTORS NOT RAISED BY THE DEFENSE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number: 2.00 2.00

09/11/2002 981/553 MOTION TO PRECLUDE READMISSION OF TRIAL PHRASE EVIDENCE AND EXHIBITS IN THE PENALTY PHRASE AND RELATED PROSECUTORIAL COMMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number: 2.00 2.00

09/11/2002 981/552 VOIR DIRE MEMORANDUM:THE DEFENSE 2.00 2.00

	MUST BE ALLOWED TO EXAMINE PROSPECTIVE JURORS REGARDING THEIR VIEWS ON CAPITAL PUNISHMENT PRIOR TO THEIR EXCUSAL IS TAKEN UNDER ADVISMENT. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:		
09/11/2002	981/551 MOTION FOR INSTRUCTION THAT THE STATE BEARS THE BURDEN OF PROVING THE ABSENCE OF ANY MITIGATING FACTORS OFFERED BY THE DEFENSE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	POSTAGE Amount Owed: \$0.74 Paid Before Conversion: \$0.00 Receipt Number:	0.74	0.74
09/11/2002	981/582 FINDINGS OF FACTS AND CONCLUSIONS OF LAW. DEFTS MOTION TO SUPPRESS IS OVERRULED. SEE J/E. 9/11/02 COPIES SENT TO: PROSECUTOR & A CONSOLDANE Amount Owed: \$30.00 Paid Before Conversion: \$0.00 Receipt Number:	30.00	30.00
09/11/2002	981/550 MOTION TO INSTRUCT THE JURY THAT IT IS TO RETURN A VERDICT OF DEATH ONLY AFTER THE PROPER WEIGHING AND DETERMINING THAT DEATH IS THE APPROPRIATE PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/549 MOTION FOR CLOSURE OF THE PRETRIAL HEARINGS AND TO INSULATE VENIRE AND JURY DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/548 MOTION IN LIMINE TO EXCLUDE PHOTOGRAPHS OF THE DECEDENTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/547 MOTION TO RESTRAIN PARTIES FROM DISCUSSING THE CASE WITH THE DEFENDANT GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00	2.00	2.00

## Receipt Number:

09/11/2002	981/546 MOTION FOR AN ORDER REGULATING THE TRANSFER OF THE DEFENDANT FROM JAIL TO THE COURTROOM CONTINUED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/545 MOTION TO PROHIBIT THE FILMING, PHOTOGRAPHING OR VIDEOTAPING OF THE DEFENDANT WHILE IN THE COURTROOM IN THE EVENT THE DEFENDANT BECOMES A WITNESS AT TRIAL GRANTED, BUT DENIES DEFENDANTS MOTION TO THE EXTENT THAT THE DEFENDANT IS MERELY PRESENT IN THE COURTEOOM. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/544 MOTION TO INCREASE THE BURDEN OF PROOF TO BEYOND ALL DOUBT IN BOTH THE TRIAL AND SENTENCING PHRASES DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/543 MOTION FOR ALL MOTIONS TO BE HEARD ON THE RECORD GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/542 DEFENDANTS REQUEST FOR RULING ON ALL MOTIONS PRIOR TO COMMENCEMENT OF TRIAL GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/541 MOTION FOR TRANSCRIPTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/540 MOTION FOR AN INCREASE IN THE NUMBER OF PEREMPTORY CHALLENGES DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/539 MOTION FOR AN ALTERNATING VOIR DIRE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/538 MOTION TO REDUCE BIAS IN	2.00	2.00



THE ANNUAL JURY LIST DENIED.  
 SEE JE Amount Owed: \$2.00 Paid Before  
 Conversion: \$0.00 Receipt Number:

09/11/2002	981/537 MOTION REQUESTING MITIGATING PHASE INSTRUCTIONS ON REMNANT DOUBT ABOUT GUILTY AND MERCY AS MITIGATING FACTORS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/536 MOTION TO PROHIBIT STATE FROM USING PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/535 MOTION TO PROHIBIT DEATH QUALIFICATION OF POTENTIAL JURORS UNLESS AND UNTIL THE PROSECUTION HAS SHOWN PROBABLE CAUSE THAT THE CASE WILL PROCEED TO MITIGATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/534 MOTION TO COMPEL ALL STATE AGENTS TO TURN OVER TO THE PROSECUTING ATTORNEYS AND TO ADVISE THEM OF ALL INFORMATION ACQUIRED DURING THE COURSE OF THE INVESTIGATION OF THIS CASE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/533 MOTION FOR AN ORDER DIRECTING THAT A COMPLETE COPY BE MADE AND TURNED OVER TO THE COURT FOR REVIEW AND TO BE SEALED FOR APPELLATE REVIEW DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/532 MOTION FOR PENALTY PHASE JURY INSTRUCTION RESPECTING ORDER OF DELIBERATIONS AND LACK OF NECESSITY TO FIRST AGREE UNANIMOUSLY ON A VERDICT OF DEATH DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion:	2.00	2.00

\$0.00 Receipt Number:

09/11/2002	981/531 MOTION TO PROHIBIT REFERENCES TO THE JURY AT ANY POINT IN THESE PROCEEDINGS THAT A VERDICT AS TO DEATH IS ONLY A RECOMMENDATION IN THE ALTERNATIVE MOTION TO PROHIBIT REFERENCES TO THE BINDING OR NON BINDING NATURE OF THE JURY'S DETERMINATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/530 DEFENDANTS MOTION REGARDING (A) NO COMMENTS ON DEFENSE WITNESS LIST GRANTED. (B) NO COMMENTS ON THE FACT THAT DEFENSE EXPERTS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/529 MOTION FOR DISCLOSURE OF ANY AND ALL AGREEMENTS AND OR BENEFITS AND OR DEALS INVOLVING PROSECUTING WITNESSES GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/528 MOTION TO PROHIBIT DEATH QUALIFICATION OF JURY: IN THE ALTERNATIVE, IF NECCESARY, TO SEAT A SEPERATE JURY DURING PENALTY PHASE OF TRIAL DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/527 MOTION TO COMPEL DISCLOSURE OF THE PROSECUTING ATTORNEYS JURY SELECTION DATA DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/526 MOTION TO ALLOW THE DEFENSE TO ARGUE LAST AT THE PENALTY PHASE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/525 DEFENDANTS MOTION TO HAVE THE COURT FOLLOW THE OHIO REV CODE 2945-25(C) STANDARD FOR DEATH QUALIFICATIONS DENIED. SEE JE Amount Owed: \$2.00 Paid Before	2.00	2.00

	Conversion: \$0.00 Receipt Number:		
09/11/2002	981/524 DEFENDANTS MOTION TO PROHIBIT THE USE OF PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/523 MOTION TO ALLOW THE DEFENSE TO ARGUE FIRST AND LAST AT THE SENTENCING HEARING DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/522 MOTION TO CHALLENGE THE ARRAY OF THE GRAND JURY AND PETIT JURY DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/521 MOTION FOR A CHANGE OF VENUE CONTINUED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/520 MOTION FOR AUGMENTED UNANIMITY INSTRUCTION FOR CAPITAL SPECIFICATION DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/519 MOTION TO PROHIBIT ANY EVIDENCE BEARING ON THE VICTIM OR VICTIM IMPACT DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/518 MOTION TO PROHIBIT ANY REFERENCES TO THE FIRST PHRASE AS THE GUILT PHASE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/517 MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE ON SELECT TOPICS GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/516 MOTION TO REQUIRE PROSECUTOR TO STATE REASONS FOR EXERCISING PEREMPTORY CHALLENGES DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00

09/11/2002	981/515 MOTION TO SUBMIT QUESTIONNAIRE TO PROSPECTIVE JURORS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/514 MOTION TO COMPEL DISCLOSURE OF EXCULPATORY AND IMPEACHMENT EVIDENCE GRANTED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/513 CONSTITUTIONAL MOTION TO DISMISS DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/512 MOTION TO INSTRUCT JURY REGARDING PAROLE DENIED. SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/511 MOTION TO INSTRUCT ON SPECIFIC MITIGATING FACTORS RAISED BY DEFENSE DENIED SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/11/2002	981/510 DEFENDANTS MOTION FOR WRITTEN INSTRUCTION AND OPPORTUNITY TO REVIEW GRANTED SEE JE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
09/05/2002	MEMORANDUM IN OPPOSITION TO DEFTS MOTION FOR SPECIFIC DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
08/30/2002	980/518 STATES MOTION FOR CONTINUANCE GRANTED Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
08/29/2002	HEARING 09/05/2002 01:00 PM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
08/29/2002	MOTION TO CONTINUE FILED BY PROSECUTOR	0.00	0.00
08/23/2002	STATES SIXTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
08/23/2002	HEARING ON MOTION 08/29/2002 01:00 PM BEFORE:HON. JOHN M. STUARD LOC:COURT 2 HEARING ON MOTION FOR SPECIFIC DISCOVERY	0.00	0.00

	(N8/23/02)		
08/07/2002	NOTICE OF REQUEST FOR SPECIFIC DISCOVERY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
07/29/2002	STATE'S FIFTH SUPPLEMENTAL RESPONSE TO DEFENDANT'S REQUEST FOR DISCOVERY FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
05/31/2002	STATE'S BRIEF IN OPPOSITION TO DEFENDANT'S MOTION TO SUPPRESS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
05/03/2002	STATES FOURTH SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
04/24/2002	POSTAGE Amount Owed: \$2.04 Paid Before Conversion: \$0.00 Receipt Number:	2.04	2.04
04/24/2002	969/878 STATES MOTION FOR AN ORDER TO TAKE HANDWRITING EXEMPLARS FROM THE DEFT IS GRANTED. 4/24/02 COPIES SENT TO: PROSECUTOR & A CONSOLDANE. 4/24/02 INSTRUCTIONS FILED - COPIES SENT TO: SGT PETER PIZULLO, D WATKINS, J LEWIS & A CONSOLDANE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
04/18/2002	STATES THIRD SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
04/17/2002	MOTION FOR AN ORDER TO TAKE HANDWRITING EXEMPLARS WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
04/15/2002	STATES SECOND SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
04/09/2002	PLTFS SUPPLEMENTAL RESPONSE TO DEFTS REQUEST FOR DISCOVERY WITH SERVICE FILED BY PROSECUTOR	0.00	0.00
03/20/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO INSTRUCT THE JURY REGARDING PAROLE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00

03/20/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION TO ALLOW THE DEFENSE TO ARGUE FIRST AND LAST AQT PENALTY OHASE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/20/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO PROHIBIT DEATH QUALIFICATION OR IN TH E ALTERNATIVE TO SEAT A SEPARATE JURY DURING THE PENALTY PHASE OF THE TRIAL FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/19/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR DISCLOSURE OF GRAND JURY TRANSCRIPT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/19/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR DISCLOSURE OF PROSECUTOR'S JURY SELECTION DATA FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/19/2002	STATE'S OPPOSITION TO DEFENDANT'S MOTION TO HAVE COURT FOLLOW THE O.R.C. 2945.25 STANDARD FOR "DEATH QUALIIFICATION " OF VENIRE PERSONS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/19/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO PROHIBIT THE USE OF PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/19/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR CLOSURE OF PRE TRIAL HEARINGS AND TO INSULATE VENIRE AND JURY FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION O PROHIBIT REFERENCES TO THE JURY THAT A VERDICT AS TO DEATH IS ONLY A RECOMMENDATION IUN THE ALTERNATIVE MOTION TO PROHIBIT REFERENCES TO THE	0.00	0.00



	BINDING OR NON-BINDING NATURE OF THE JURY DETERMINATION FILED BY THE PROSECUTOR'S		
03/14/2002	MEMORANDUM IN OIPPOSITION TO DEFENDANT'S MOTION FOR FDISCLOSE OF PROSECUTOR'S JURY SELECTION DATA FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR A CHANGE OF VENUE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO CHALLENGE ARRAY OF GRAND JURY AND PETIT JURY FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDYM IN OPPOSITION TO DEFENDANT'S MOTION TO ALLOW DEFENSE TO ARGUE FIRST AND LAST AT SENTENCING HEARING FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM CONTRA MOTION TO PROHIBIT ABT RECFDERENCES TO THE FIRST OHASE AS THE "GUILT PHASE" FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM CONTRA MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO PRRECLUDE READMISSION OF TRIAL PHASE EVIDENCE AND EXHIBITS IN PENALTY PHASE AND RELATED PROSECUTORIAL COMMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM CONTRA DEFENDANT'S MOTION TO PROHIBIT ANY EVIDENCE BEARING ON THE CHARCTER OF THE VICTIM OR VICTIM IMPACT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S ,OTION TO PROHIBIT THE PROSECUTOR FROM ARGUING AND THE COURT FROM GIVING INSTRUCTIONS REGARDING STATUTORY MITIGATING FACTORS NOT RAISED BY THE DEFENSE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00

03/14/2002	MOTION IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO PROIHIBIT PREJUDICIAL ARGUMENTS AND THEMES AT THE CLOSING ARGUMENTS OF THE PENTALTY PHASE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN REPSONSE TO DEFENDANT'S MOTION FOR WRITTEN JURY INSTRUCTIONS AND OPPORTUNITY TO REVIEW FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDYM IN OPPOSITION TO DEFENDANT'S MOTIO TO REMOVE REFERENCE TO REDUCING THE DEGREE OF BLAME FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDYM IN OPPOSITION OT DEFENDANT'S MOTION TO INSTRUCT THE JURY THAT IT IS TO WEIGH ONLY THE AGGRAVATING CIRCUMSTANCES AND NOT THE AGGRAVATED MURDER ITSELF IN DETERMINING PUNISHMENT AND TO SO LIMIT THE PROSECUTOR IN ARGUMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO INSTRUCT ON SPECIFIC MITIGATING FACTORS RAIDED BY DEFENDSE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR INSTRUCTIONS THAT STATE BEARS THE BURDEN OF PROVING THE ABSENCE OF ANY MITIGATING FACTORS OFFERED BY THE DEFENSE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO INSTRUCT THE JURY THAT IT IS TO RECOMMEND A SENTENCE OF DEATH ONLY AFTER THE PROPER WEIGHING AND DETERMINING THAT DEATH IS THE APPROPRIATE PUNSHIMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDYM IN OPPOSITION TO DEFENDANT'S MOTION FOR	0.00	0.00

	PENALTY PHASE INSTRUCTION RESPECTING ORDER OF DELIBERATIONS AND LACK OF NECESSITY TO FIRST AGREE UNANIMOUSLY ON A RECOMMENDATION OF DEATH FILED BY THE PROSECUTOR'S OFFICE		
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S CONSTITUTIONAL MOTION TO DISMISS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR AND ORDER DIRECTING THAT A COMPLETE COPY OF THE PROSECUTING ATTORNEY'S FILE BE MADE TURNED OVER TO THE COURT FOR REVIEW AND EALED FOR APPELLATE REVIEW FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO COMPEL EXCULPATORY AND IMPEACHMENT EVIDENCE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM CONTRA TO DEFENDANT'S MOTION TO COMPEL LAW ENFORCEMENT OFFICIALS TO TURN ALL INFORMATION ACQUIRED DURING INVESTIGATION FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITIUON TO DEFENDANT'S MOTION TO PROHIBIT DEATH QUALIFICATIONS UNTIL PROSECUTION HAS SHOWN PROBABLE CAUSE FOR MITGATION FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSTION TO DEFENDANT'S MOTION TO PROHIBIT THE USE OF PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO SUBMIT QUESTIONNAIRE TO PROSECITIVE JURORS FILED BY THE	0.00	0.00

PROSECUTOR'S OFFICE		
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO REQUIRE PROSECUTOR TO STATE REASONS FOR EXERCISING PEREMPTORY CHALLENGES FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE ON SELECT TOPICS FILED BY THE PROSCUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO REDUCE BIAS IN THE ANNUAL JURY LIST FILED BY THE PROSECUTOR'S	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION OT DEFENDANT'S MOTION FOR ALTERNATING VOIR DIRE FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR INCREASE IN THE NUMBER OF PEREMPTORY CHALLENGES FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR TRANSCRIPT FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S REQUEST FOR RULING ON MOTION PRIOR TO COMMENCEMENT OF TRIAL FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION TO HAVE ALL MOTION HEARD ON THE RECORD FILED THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO INCREASE BURDEN OF PROOF TO BEYOND ALL DOUBT FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00
03/14/2002	MEMORANDUM IN RESOONSE TO DEFENDANT'S MOTION TO PROHIBIT THE FILMING PHOTOGRA [HING OR VIDEOTAPING OF DEFENDANT WHILE IN THE COURTROOM FILED BY THE PROSECUTOR'S OFFICE	0.00 0.00

03/14/2002	MEMORANDUM IN RESPONSE TO DEFENDANT'S MOTION FOR AND ORDER REGULATING THE TRANSFER OF THE DEFENDANT FROM JAIL TO THE COURTROOM FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO RESTRAIN CERTAIN PARTIES FROM DISCUSSING THE CASE WITH THE DEFENDANT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO EXCLUDE PHOTOGRAPHS OF DECEDENTS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO HAVE REASONS FOR DEFENSE OBJECTIONS AND REASONS FOR OVERRULING DEFENDANT'S OBJECTIONS PLACED ON RECORD FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM CONTRA DEFENDANT'S MOTION TO PROHIBIT PROSECUTOR FROM COMMMENTING ON ACCUSED'S UNSWORN STATEMENT FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION IN LIMINE TO LIMIT THE STATE'S ARGUMENT AT MITIGATION TO AGGRAVATING CIRCUMSTANCES PROVEN AT THE TRIAL PHASE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION TO INSTRUCT THE JURY TO CONSIDER REMNANT DOUBT AND MERCY IN ITS MITIGATION PHASE INSTRUCTIONS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO REQUIRE THE JURY TO ARTICULATE THE METHOD BY WHICH IT WEIGHS THE AGGRAVATED FACTORS AGAINST THE MITIGATING	0.00	0.00

	CIRCUMSTANCE FILED BY THE PROSEXYTOR'S OFFICE		
03/14/2002	MEMORANDUM IN OIPPOSITION TO DEFENDANT'S MOTION TO PERMIT DEFENSE TO DMIT ALL RELEVANT EVIDENCE AT MITIGATION PHASE FILED THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION FOR SEQUESTRATION OF JURORS FOR DURATION OF TRIAL FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO EXTEND TIME TO FILE MOTION FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR DISCLOSURE OF WITNESS STATEMENTS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S MOTION TO DISCLOSE AND DEALS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO PROHIBIT DISPLAU OF EXHIBITS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDYM IN OPPOSITION TO DEFENDANT'S MOTYION TO PROPERLY PRESERVE AND CATALOG ALL PHYCISAL EVIDENCE FILED BY PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR DISCLOSURE OF REBUTTAL WITNESSES FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMENORANDUM IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE REGARDING "OTHER ACTS" EVIDENCE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OIPPOSITION TO DEFENDANT'S MOTION FOR A RULE FILED BY THE PROSEUTOR'S OFFICE	0.00	0.00
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR	0.00	0.00



	INDIVIDUAL SEQUESTERED VOIR DIRE FILED BY THE PROSECUTOR'S OFFICE		
03/14/2002	MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION FOR COMPREHENSIVE VOIR DIRE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S REQUEST FOR RECIPROCAL DISCOVERY FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S REQUEST BILL OF PARTICULARS FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/14/2002	STATE'S RESPONSE TO DEFENDANT'S REQUEST FOR DISCOVERY FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
03/13/2002	NOTICE TO SUPREME COURT RETURNED (COPY) CC02007	0.00	0.00
02/15/2002	MOTION TO HAVE STATEMENTS TRANSCRIBED FILED BY THE DEFENDANT	0.00	0.00
02/14/2002	STATE'S OPPOSITION TO DEFENDANT'S MOTION FOR A SECOND VOIR DIRE AFTER GUILT PHASE FILED BY THE PROSECUTOR'S OFFICE	0.00	0.00
01/25/2002	962/905 WAIVER OF SPEEDY TRIAL FOR 250 DAYS UNTIL 10/8/02 Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/24/2002	JURY TRIAL 10/08/2002 09:00 AM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
01/24/2002	HRG ON MOTION TO SUPPRESS 04/17/2002 09:00 AM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
01/24/2002	HEARING ON PENDING MOTIONS 03/20/2002 09:00 AM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
01/23/2002	MOTION FOR TRANSCRIPT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR TRANSCRIPT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO ALLOW THE DEFENSE TO ARGUE LAST AT THE PENALTY PHASE FIELD BY THE DEFENDANT'S	0.00	0.00

ATTORNEY		
01/23/2002	MOTION TO COMPEL DISCLOSURE OF PROSECUTING ATTORNEY'S JURY SELECTION DATA FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO PROHIBIT DEATH QUALIFICATION OF THE JURY OR IN THE ALTERNATIVE IF NECESSARY TO SEAT A SEPARATE JURY DURING THE PENALTY PHASE OF TRIAL FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	VIOR DIRE MEMORANDUM VENIREPERSONS WHO CANNOT FAIRLY CONSIDER MITIGATING EVIDENCE AND WHO WOULD AUTOMATICALLY VOTE FOR DEATH UPON A SHOWING OG GUILT MUST BY EXCUSED FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	VOIR DIRE MEMORANDUM THE DEFENSE MUST BE ALLOWED TO EXAMINE PROSPECTIVE JURORS REGARDING THEIR VIEWS ON CAPITAL PUNISHMENT PRIOR TO THEIR EXCUSAL FILED BY THE DEFENDANT'S ATTORNEY	0.00 0.00
01/23/2002	MOTION FOR A CHANGE OF VENUE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO CHALLENGE THE ARRAY OF THE GRAND JURY AND PETIT JURY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO ALLOW THE DEFENSE TO ARGUE FIRST AND LAST AT THE SENTENCING HEARING FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO PROHIBIT ANY REFERENCES TO THE FIRST PHASE AS THE "GUILT PHASE" FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO PRECLUDE READMISSION OF TRIAL PHASE	0.00 0.00

	EVIDENCE AND EXJIBITS IN PENALTY PHASE AND RELATED PROSECUTORIAL COMMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLANDE.		
01/23/2002	MOTION TO PROHIBIT ANY EVIDENCE BEARING ON THE CHARCTER OF THE VICTIM OR VICTIM IMPACT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSODLANE	0.00	0.00
01/23/2002	MOTION TO PROHIBIT THE PROSECUTOR FROM ARGUING AND THE COURT FROM GIVING INSTRUCTIONS REGARDING STATUTORY MITIGATING FACTORS NOT RAISED BY THE DEFENSE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION IN LIMINE TO PROHIBIT PREJUDICIAL ARGUMENTS AND THEMES AT THE CLOSING ARGUMENT OF THE PENALTY PHASE FILED BY THE DEFENDANT'S ATTONREY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR ARGUMENTED UNANIMITY INSTRUCTION FOR CAPITAL SPECIFICATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR WRITTEN JURY INSTRUCTION AND OPPORTUNITY TO REVIEW FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO ALTER DEFINITION OF MITGATING CIRCUMSTANCES TO REMOVE REFERNCE TO REDUCING THE DEGREE OF BLAME AND TO REPLACE4 THIS WITH OTHER LANGUAGE AND TO SO LIMIT THE PROSECUTOR IN ARGUMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSYTRUCT THE JURY THAT IT IS TO WEIGH ONLY THE AGGRAVARING CIRCUMSTANCE AND NOT THE AGGRAVATED MURDER ITSELF IN DETERMINING PUNISHMENT AND TO SO LIMIT THE	0.00	0.00

	PROSECUTOR IN ARGUMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	MOTION TO PROHIBIT REFERENCE TO NATURE AND CIRCUMSTANCES OF THE OFFENSE AS A FACTOR TO BE CONSIDERED IN MIGATION OR IN INTRODUCTORY LANGUAGE RESPECTING MITIGATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT ON SPECIFIC MITIGATING FACTORS RAISED BY DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR INSTRUCTION THAT THE STATE BEARS THE BURDEN OF PROVING THE ABSENCE OF ANY MITIGATING FACTORS OFFERED BY THE DEFENSE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT THE JURY THAT IT IS TO RETURN A VERDICT OF DEATH ONLY AFTER THE PROPER WEIGHING AND DETERMINING THAT DEATH IS THE APPROPRIATE PUNISHMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT THE JURY REGARDING PAROLE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR PENALTY PHASE JURY INSTRUCTION RESPECTING ORDER OF DELIBERATIONS AND LACK OF NECESSITY TO FIRST AGREE UNANIMOUSLY ON A VERDICT OF DEATH FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S CONSTITUTIONAL MOTION TO DISMISS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR AN ORDER DIRECTING THAT A COMPLETE COPY OF THE PROSECUTOR'S FILED BY MADE AND TURNED OVER TO THE COURT	0.00	0.00

	FOR REVIEW AND TO BE SEALED FOR APPELLATE REVIEW IF NECESSARY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE		
01/23/2002	DEFENDANT'S MOTION TO COMPEL DISCLOSURE OF EXCULPATORY AND IMPEACHMENT EVIDENCE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO COMPEL ALL STATE AGENTS TO TURN OVER TO THE PROSECUTING ATTORNEY'S AND TO ADVISE THEM OF ALL INFORMATION ACQUIRED DURING THE COURSE OF THE INVESTIGATION OF THIS CASE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT DEATH QUALIFICATION OF POTENTIAL JURORS AND UNTIL THE PROSECUTION HAS SHOWN PROBABLE CAUSE THAT THE CASE WILL PROCEED TO MITIGATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT THE STATE FROM USING PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO SUBMIT QUESTIONNAIRE TO PROSPECTIVE JURORS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO REQUIRE PROSECUTOR TO STATE REASONS FOR EXERCISING PEREMPTORY CHALLENGES FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE ON DELECT TOPICS FILED THE	0.00	0.00

	DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	DEFENDANT'S MOTION TO REDUCE BIAS IN THE ANNUAL JURY LIST FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR ALTERNATING VOIR DIRE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR AN INCREASE IN THE NUMBER OF PEREMPTORY CHALLENGES FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR TRANSCRIPTS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S REQUEST FOR RULINGS ON ALL MOTIONS PRIOR TO COMMENCEMENT OF TRIAL FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLANDE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR ALL MOTIONS TO BE HEARD ON THE RECORDS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00





## General Inquiry



New Search

Summary

Parties

Events

Dockets

Fields

Notes

Disposition

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## Docket Search

2001 CR 00794 STATE OF OHIO -VS- JACKSON, NATHANIEL E JMS

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Desc.

Begin Date

12/01/2001

Sort

End Date

01/23/2002

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Search Results 97 Docket(s) found matching search criteria.

Docket Date	Docket Text	Amount	Amount Due	Images
01/23/2002	MOTION FOR TRANSCRIPT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00	
01/23/2002	MOTION FOR TRANSCRIPT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00	
01/23/2002	MOTION TO ALLOW THE DEFENSE TO ARGUE LAST AT THE PENALTY PHASE FIELD BY THE DEFENDANT'S ATTONREY	0.00	0.00	
01/23/2002	MOTION TO COMPEL DISCLOSURE OF PROSECUTING ATTORNEY'S JURY SELECTION DATA FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00	
01/23/2002	MOTION TO PROHIBIT DEATH QUALIFICATION OF THE JURY OR IN THE ALTERNATIVE IF NECESSARY TO SEAT A SEPARATE JURY DURING THE PENALTY PHASE OF TRIAL FILED BY THE DEFENDANT'S ATTORNEY ANTHONY	0.00	0.00	

CONSOLDANE		
01/23/2002	VIOR DIRE MEMORANDUM VENIREPERSONS WHO CANNOT FAIRLY CONSIDER MITIGATING EVIDENCE AND WHO WOULD AUTOMATICALLY VOTE FOR DEATH UPON A SHOWING OG GUILT MUST BY EXCUSED FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	VOIR DIRE MEMORANDUM THE DEFENSE MUST BE ALLOWED TO EXAMINE PROSPECTIVE JURORS REGARDING THEIR VIEWS ON CAPITAL PUNISHMENT PRIOR TO THEIR EXCUSAL FILED BY THE DEFENDANT'S ATTORNEY	0.00 0.00
01/23/2002	MOTION FOR A CHANGE OF VENUE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO CHALLENGE THE ARRAY OF THE GRAND JURY AND PETIT JURY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO ALLOW THE DEFENSE TO ARGUE FIRST AND LAST AT THE SENTENCING HEARING FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO PROHIBIT ANY REFERENCES TO THE FIRST PHASE AS THE "GUILT PHASE" FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	MOTION TO PRECLUDE READMISSION OF TRIAL PHASE EVIDENCE AND EXJIBITS IN PENALTY PHASE AND RELATED PROSECUTORIAL COMMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLANDE.	0.00 0.00
01/23/2002	MOTION TO PROHIBIT ANY EVIDENCE BEARING ON THE CHARCTER OF THE VICTIM OR VICTIM IMPACT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSODLANE	0.00 0.00
01/23/2002	MOTION TO PROHIBIT THE PROSECUTOR FROM ARGUING AND	0.00 0.00

	THE COURT FROM GIVING INSTRUCTIONS REGARDING STATUTORY MITIGATING FACTORS NOT RAISED BY THE DEFENSE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	MOTION IN LIMINE TO PROHIBIT PREJUDICIAL ARGUMENTS AND THEMES AT THE CLOSING ARGUMENT OF THE PENALTY PHASE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR ARGUMENTED UNANIMITY INSTRUCTION FOR CAPITAL SPECIFICATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION FOR WRITTEN JURY INSTRUCTION AND OPPORTUNITY TO REVIEW FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO ALTER DEFINITION OF MITGATING CIRCUMSTANCES TO REMOVE REFERNCE TO REDUCING THE DEGREE OF BLAME AND TO REPLACE4 THIS WITH OTHER LANGUAGE AND TO SO LIMIT THE PROSECUTOR IN ARGUMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSYTRUCT THE JURY THAT IT IS TO WEIGH ONLY THE AGGRAVARING CIRCUMSTANCE AND NOT THE AGGRAVATED MURDER ITSELF IN DETERMINING PUNISHMENT AND TO SO LIMIT THE PROSECUTOR IN ARGUMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO PROHIBIT REFERENCE TO NATURE AND CIRCUMSTANCES OF THE OFFENSE AS A FACTOR TO BE CONSIDERED IN MIGATION OR IN INTRODUCTORY LANGUAGE RESPECTING MITIGATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT ON SPECIFIC MITIGSATING FACTORS RAISED BY	0.00	0.00

	DEFENDNSE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	MOTION FOR INSTRUCTION THAT THE STATE BEARS THE BURDEN OF PROVING THE ABBSENCE OF ANY MITIGATING FACTORS OFFERED BY THE DEFENSE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT THE JURY THAT IT IS TO RETURN A VERDICT OF DEATH ONLY AFTER THE PROPER WEIGHING AND DETERMINING THAT DEATH IS THE APPROPRIATE PUNISHMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	MOTION TO INSTRUCT THE JURY REGARDING PAROLE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDSOLDANE	0.00	0.00
01/23/2002	MOTION FOR PENALTY PHASE JURY INSRUCTION RESPECTING ORDER OF DELIBERATIONS AND LACK OF NECEDDITY TO FIRST AGREE UNANIMOUSLY ON A VERDICT OF DEATH FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S CONSTITUTIONAL MOTION TO DISMISS DILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR AN ORDER DIRECTING THAT A COMPLETE COPY OF THE PROSECUTOR'S FILED BY MADE AND TURNED OVER TO THE COURT FOR REVIEW AND TO BE SEALED FOR APPELLATE REVIEW IF NECESSARY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO COMPEL DISCLOSURE OF EXCULPATORY AND IMPEACHMENT EVIDENCE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONDOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO COMPEL ALL STATE AGENTS TO TURN OVER	0.00	0.00

	TO THE PROSECUTING ATTORNEY'S AND TO ADVISE THEM OF ALL INFORMATION ACQUIRED DURING THE COURSE OF THE INVESTIGATION OF THIS CASE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT DEATH QUALIFICATION OF POTENTIAL JURORS AND UNTIL THE PROSECUTION HAS SHOWN PROBABLE CAUSE THAT THE CASE WILL PROCEED TO MITIGATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT THE STATE FROM USING PEREMPTORY CHALLENGES TO EXCLUDE JURORS WHO EXPRESS CONCERNS ABOUT CAPITAL PUNISHMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO SUBMIT QUESTIONNAIRE TO PROSPECTIVE JURORS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO REQUIRE PROSECUTOR TO STATE REASONS FOR EXERCISING PEREMPTORY CHALLENGES FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE ON DELECT TOPICS FILED THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO REDUCE BIAS IN THE ANNUAL JURY LIST FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR ALTERNATING VOIR DIRE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR AN INCREASE IN THE NUMBER OF PEREMPTORY CHALLENGES FILED	0.00	0.00

	BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE		
01/23/2002	DEFENDANT'S MOTION FOR TRANSCRIPTS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S REQUEST FOR RULINGS ON ALL MOTIONS PRIOR TO COMMENCEMENT OF TRIAL FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLANDE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR ALL MOTIONS TO BE HEARD ON THE RECORDS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO INCREASE THE DURDEN OF PROOF TO PROOF BEYOND ALL DOUBT IN BOTH THE TRIAL AND SENENCING PHASES FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT THE FILMING PHOTOGRAPHING OR VIDEOTAPING OF THE DEFENDANT WHILE IN THE COURTROOM FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR AN ORDER REGULATING THE TRANSFER OF DEFENDANT FROM JAIL TO THE COURTROOM FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO RESTRAIN CERTAIN PARTIES FROM DISCUSSING THE CASE WITH DEFENDANT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION IN LIMINE TO EXCLUE PHOTOGRAPHS OF THE DECEDENTS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR CLOSURE OF PRETRIAL HEARING AND TO INSULATE VEMIRE AND JURY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY	0.00	0.00



CONSOLDANE		
01/23/2002	DEFENDANT'S MOTION TO ALLOW FULL STATEMENT OF DEFENSE OBJECTIONS AT TRIAL AND TO REQUIRE A STATEMENT OF REASON FOR OVERRULING SAME ON THE RECORD FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	DEFENDANT'S MOTION FOR A SECOND VOIR DIRE OF THE JURY IF THE DEFENDANT IS FOUND GUILTY AT THE TRIAL PHASE FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	DEFENDANT'S MOTION TO PROHIBIT PROSECUTOR FROM COIMMENTING ON DEFENDANT'S UNSWORN STATEMENT FILED BY THE DEFENDANT'S ATTORNEY ANTHINY CONSOLDANE	0.00 0.00
01/23/2002	DEFENDANT'S MOTION IN LIMINE TO LIMIT THE STATE'S ARGUMENT AT MITGATION TO THE AGGRVATING CIRCUMSTANCES PROVEN AT THE TRIAL PHASE FILED BY THE DEFENDANT'S ATTORNEY ANTHONHY CONSOLDANE	0.00 0.00
01/23/2002	DEFENDANT'S MOTION REQUESTING MITIGATION PHASE INSTRUCTIONS ON REMNANT DOUBT ABOUT GUILT AND MERCY AS MITIGATING FACTORS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00 0.00
01/23/2002	DEFENDANT'S MOTION TO REQUIRE THE JURY TP ARTICULATE THE METHOD BY WHICH IT WEIGHS THE AGGRAVATING AGAINST THE MITIGATING CIRCUMSTANCES FILED BY THE DEFENDANT'S ATTORNEY	0.00 0.00
01/23/2002	DEFENDANT'S MOTION TO PERMIT DEFENSE TO ADMIT ALL RELEVANT EVIDENCE AT MITGATION PHASE FILED BY THE DEFENDANT'S ATTORNEY	0.00 0.00
01/23/2002	DEFENDANT'S MOTION FOR SEQUESTRATION OF JURORS FOR DURATION OF TRIAL FILED BY THE DEFENDANT'S ATTORNEY	0.00 0.00

01/23/2002	DEFENDANT'S MOTION FOR DISCLOSURE OF THE TRANSCRIPT OF PROCEEDING BEFORE THE GRAND JURY FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO EXTEND TIME TO FILE MOTIONS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR DISCLOSURE OF WITNESS STATEMENTS PRIOR TO TRIAL FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR DISCLOSURE OF ANY AND ALL AGREEMENTS AND OR BENEFITS AND OR DEALS INVOLING PROSECUTING WITNESS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION IN LIMINE TO PROHIBIT DISPLAY OF EXHIBITS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PERMIT DEFENDANT TO APPEAR IN CIVILIAN CLOTHING AT ALL COURT PROCEEDINGS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO PROPERLY PRESERVE AND CATALOG ALL PHYSICAL EVIDENCE FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION IN LIMINE REGARDING A-NO COMMENTS ON DEFENSE WITNESS LIST B-NO COMMENTS ON THE FACT DEFENSE EXPERTS DID NOT PRODUCE WRITTEN REPORTS; AND C-NO COMMENTS ON COSTS CONNECTED WITH DEFENSE EXPERTS FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO SUPPRESS STATEMENTS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR DISCLOSURE OF REBUTTAL WITNESSES FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	MOTION TO PROHIBIT REFERENCES	0.00	0.00

TO THE JURY AT ANY POINT IN  
THESE PROCEEDINGS THAT A  
VERDICT AS TO DEATH IS ONLY A  
RECOMMENDATION IN THE  
ALTERNATIVE MOTION TO  
PROHIBIT REFERENCES TO THE  
BINDING OR NON BINDING NATURE  
OF THE JURY'S DETERMINATION  
FILED BY THE DEFENDANT'S  
ATTORNEY ANTHONY  
CONSOLDANE

01/23/2002	DEFENDANT'S MOTION IN LIMINE REGARDING OTHER ACTS EVIDENCE FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION TO RECORD ALL SIDE BAR PROCEEEDING FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOE A RULE 104 HEARING FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE FILED BY THE DEFENANT'S ATTORNEY	0.00	0.00
01/23/2002	DEFENDANT'S MOTION FOR A COMPREHENSIVE VIOR DIRE FILED BY THE DEFENDANT'S ATTORNEY	0.00	0.00
01/23/2002	MOTION FILED ON BEHALF OF DEFENDANT FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/18/2002	962/354 ORDER REGARDING THE DEFENSE EMPLOYING DR. SANDRA MCPHERSON PH.D AS EXPERT ASSITANCE TO AID IN THE DEFENSE. 1-22-02 SENT COPIES TO PROS., AND A CONSOLDANE. Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
01/10/2002	CERTIFIED MAIL NUMBER 891802 RETURNED ENDORSED FROM THE SUPREME COURT OF OHIO ON 1/10/02 BY ?	0.00	0.00
01/09/2002	POSTAGE Amount Owed: \$0.68 Paid Before Conversion: \$0.00 Receipt Number:	0.68	0.68
01/09/2002	961/279 DEFTS MOTION TO EMPLOY DR SANDRA MCPHERSON AND DONALD MCPHERSON AS EXPERT ASSISTANCE TO AID IN THE	2.00	2.00

DEFENSE IS GRANTED. 1/9/02  
COPIES SENT TO: PROSECUTOR & A  
CONSOLDANE Amount Owed: \$2.00  
Paid Before Conversion: \$0.00 Receipt  
Number:

01/07/2002	DEFENDANT'S MOTION FOR APPOINTMENT OF INVESTIGATOR AND MITIGATION FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/07/2002	DEFENDANT'S DEMAND FOR DISCOVERY FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLANDE	0.00	0.00
01/07/2002	DEFENDANT'S MOTION FOR BILL OF PARTICULARS FILED BY THE DEFENDANT'S ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/07/2002	VICTIM'S RIGHTS NOTIFICATION FILED.	0.00	0.00
01/04/2002	CERTIFIED MAILER NUMBER 0891 802 SENT TO: THE SUPREME COURT OF OHIO Amount Owed: \$5.00 Paid Before Conversion: \$0.00 Receipt Number:	5.00	5.00
01/03/2002	COPY OF LETTER SENT TO THE SUPREME COURT OF OHIO APPOINTMENT OF TRIAL COUNSEL IN A CAPITAL CASE JUST A COPY FILED BY ATTORNEY ANTHONY CONSOLDANE	0.00	0.00
01/03/2002	PRE TRIAL 01/23/2002 01:00 PM JUDGE:HON. JOHN M. STUARD LOC:COURT 2 RESET FROM 1/30/2002	0.00	0.00
01/03/2002	PRE TRIAL 01/30/2002 09:00 AM JUDGE:HON. JOHN M. STUARD LOC:COURT 2 (N1-3-02)	0.00	0.00
12/31/2001	CAPIAS RETURNED AND ENDORSED BY SHERIFF ON NATHANIEL E JACKSON SHERIFF ALTIERE	0.00	0.00
12/31/2001	SUMMONS ON INDICTMENT RETURNED BY SHERIFF NATHANIEL E JACKSON SHERIFF ALTIERE Amount Owed: \$2.00 Paid Before Conversion: \$0.00 Receipt Number:	2.00	2.00
12/31/2001	NOT GUILTY PLEA TO ARRAIGNMENT ON INDICTMENT & SUMMONS NO BOND SET	0.00	0.00
12/28/2001	INDICTMENT AND SUMMONS FILED BY PROSECUTOR'S OFFICE AND	2.00	2.00

COPIES OF SAME ISSUED TO  
SHERIFF. Amount Owed: \$2.00 Paid  
Before Conversion: \$0.00 Receipt  
Number:

12/28/2001	DIRECT PRESENTMENT FOR CT 1: AGG MURDER (F) W/SPECS OF AGG CIRCUMSTANCES CT 2: AGG MURDER (F) W/SPECS OF AGG CIRCUMSTANCES CT 3: AGG BURGLARY (F1) W/FIREARM SPEC CT 4: AGG ROBBERY (F1) W/FIREARM SPEC	0.00	0.00
12/28/2001	PRELIMINARY HEARING 12/31/2001 11:00 AM BEFORE:HON. JOHN M. STUARD LOC:COURT 2	0.00	0.00
12/21/2001	NOT GUILTY PLEA TO ARRAIGNMENT. NO BOND SET.	0.00	0.00
12/21/2001	COMPLAINT AND AFFIDAVIT FILED UNDER SEAL BY ORDER OF THE COURT	0.00	0.00
12/21/2001	WARRANT ON COMPLAINT AND RETURN OF SERVICE FILED.	0.00	0.00
12/20/2001	SPECIAL PROJECTS JUDGES Amount Owed: \$50.00 Paid Before Conversion: \$0.00 Receipt Number:	50.00	50.00
12/20/2001	VICTIMS OF CRIME Amount Owed: \$30.00 Paid Before Conversion: \$0.00 Receipt Number:	30.00	30.00
12/20/2001	GENERAL REVENUE FUND Amount Owed: \$11.00 Paid Before Conversion: \$0.00 Receipt Number:	11.00	11.00
12/20/2001	PRISONER FEES Amount Owed: \$11.00 Paid Before Conversion: \$0.00 Receipt Number:	11.00	11.00
12/20/2001	FILING FEE FOR EACH CAUSE OF ACTION AND EACH UNDERTAKING Amount Owed: \$27.00 Paid Before Conversion: \$0.00 Receipt Number:	27.00	27.00

# WARRANT TO ARREST

## RULE 4

In the Trumbull County Common Pleas Court, Warren, Ohio

THE STATE OF OHIO,  
vs.

Name NATHANIEL E. JACKSON

Address 309 South Pearl Street

Youngstown, Ohio

Case No. 01-CR-794

### WARRANT ON COMPLAINT (RULE 4)

To Detective Sgt. Paul Monroe of Howland Police Department and/or any other law Enforcement Officer  
(Officer Authorized to Execute a Warrant)

A complaint, a copy of which is attached hereto, has been filed in the Trumbull County Common Pleas Court  
charging AGGRAVATED MURDER (ORC 2903.01(A))  
AGGRAVATED BURGLARY (ORC 2911.11(A)(1) and/or (2) and (B))

Describe the offense and state the numerical designation of the applicable statute.

You are ordered to arrest NATHANIEL E. JACKSON  
and bring him before said Court without unnecessary delay.

You may not issue summons in lieu of arrest under Rule 4(A) (2) or issue summons after arrest under  
(may - may not)

Rule 4(F) because

Special instructions to executing officer:

MARCAREL R. O'BRIEN  
CLERK OF COURTS  
TRUMBULL COUNTY  
DEC 21 10 05 AM '01  
RECORDED  
VOL PAGE

*[Signature]*

Judge - Officer Designated by Judge(s) -  
Clerk - Deputy Clerk

*Dec 20, 2001*

Trumbull County, Ohio

### SUMMONS ENDORSEMENT

Use only in appropriate case

This warrant was executed/by arrest and/by issuing the following summons.

To \_\_\_\_\_  
(defendant)

You are hereby summoned and ordered to appear at \_\_\_\_\_ o'clock \_\_\_\_\_ M.

\_\_\_\_\_, 19\_\_\_\_, at the above captioned Court.  
(day) (month) (date)

If you fail to appear at the time and place stated above you may be arrested.



## RECEIPT OF WARRANT BY EXECUTING AUTHORITY

## First Receipt

Received this warrant on 12-20, 192001,  
at 5:40 o'clock P m.

By

Title

Det. Sgt. Paul Monroe

## Subsequent Receipt

Received this (alias)(warrant) on \_\_\_\_\_, 19\_\_\_\_,  
at \_\_\_\_\_ o'clock \_\_\_\_ m.

Officer

By

Title

## RETURN OF EXECUTED WARRANT

## Fees

Mileage \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

## 1. Execution By Arrest

I received this warrant on 12-20, 192001, at  
5:40 o'clock P m. On 12-21, 192001, I  
arrested Nathaniel E. Jackson and gave him a copy of this warrant  
with complaint attached and brought to Trumbull County Jail  
state the place

Det. Sgt. Paul Monroe

Arresting Officer, Title

## Fees

Mileage \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

## 2. Execution By Issuance Of Summons Under Rule 4(A)(2) By Executing Officer

I received this warrant on \_\_\_\_\_, 19\_\_\_\_, at  
\_\_\_\_\_ o'clock \_\_\_\_ m. On \_\_\_\_\_, 19\_\_\_\_, I  
executed this warrant by issuing \_\_\_\_\_ a summons by \_\_\_\_\_  
\_\_\_\_\_ service which ordered \_\_\_\_\_ to appear at \_\_\_\_\_  
\_\_\_\_\_ day \_\_\_\_\_ date \_\_\_\_\_ room \_\_\_\_\_ at the captioned Court. The sum-  
mons was endorsed upon the warrant and accompanied by a copy of the complaint.

Issuing Officer, Title

## Fees

Mileage \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

## 3. Execution By Arrest And Issuance Of Summons Under Rule 4(F) By Arresting Officer

I received this warrant on \_\_\_\_\_, 19\_\_\_\_, at  
\_\_\_\_\_ o'clock \_\_\_\_ m. On \_\_\_\_\_, 19\_\_\_\_, I  
arrested \_\_\_\_\_ and after arrest I issued \_\_\_\_\_ a summons by  
personal service which ordered \_\_\_\_\_ to appear at caption Court at \_\_\_\_\_  
\_\_\_\_\_ day \_\_\_\_\_ date \_\_\_\_\_ room \_\_\_\_\_ . The sum-  
mons was endorsed upon the warrant and accompanied by a copy of the complaint.

Issuing Officer, Title

## 4. Execution By Arrest And Issuance Of Summons Under Rule 4(F) By Superior Of Arresting Officer

On \_\_\_\_\_, 19\_\_\_\_, \_\_\_\_\_ was arrested by \_\_\_\_\_  
name of arresting officer  
and I issued \_\_\_\_\_ a summons by personal service which ordered \_\_\_\_\_ to appear at \_\_\_\_\_  
\_\_\_\_\_ time \_\_\_\_\_ day \_\_\_\_\_ date \_\_\_\_\_ room \_\_\_\_\_

Issuing Officer, Title

## RETURN OF UNEXECUTED WARRANT

I received this warrant on \_\_\_\_\_, 19\_\_\_\_, at  
\_\_\_\_\_ o'clock \_\_\_\_ m. On \_\_\_\_\_, 19\_\_\_\_, I  
attempted to execute this warrant but was unable to do so because \_\_\_\_\_

state specific reason or reasons and

additional information regarding defendant's whereabouts

Executing Officer, Title

**COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO**

STATE OF OHIO )  
 )  
COUNTY OF TRUMBULL ) SS.

VOL \_\_\_\_\_

PAGE \_\_\_\_\_

RECORDED

DEC 21 11 12 AM '01

MAIL ROOM  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF TEXAS

# AFFIDAVIT FOR ARREST WARRANT

Before me, the Honorable John M. Stuard, Judge of the Court of Common Pleas, Trumbull County, Ohio, and for the above-named County, personally came Detective Paul Monroe of the Howland Township Police Department, 169 Niles-Cortland Road, Warren, Ohio. Affiant has been employed by the Howland Township Police Department as a police officer for fourteen (14) years.

On December 12, 2001 at approximately 12:00 a.m., Trumbull County 911 dispatch received an emergency telephone call from the residence of Donna M. Roberts and Robert S. Fingerhut at 254 Fonderlac SE, Warren, Ohio 44484. The caller identified herself as the wife of Fingerhut, told the dispatcher that there was a problem with her husband, and that he was on the kitchen floor. She was screaming and complaining of a problem with her heart. Emergency vehicles were immediately sent to the home.

The Fingerhut home is a large single story brick home with two bedrooms and six other rooms. The home is located in Howland Township, Trumbull County, Ohio and surrounded by other large residential houses in what is known as Avalon Estates. Ptlm. Albert Ray arrived at the home and found Robert Fingerhut dead in a pool of blood near the open kitchen door which leads to an attached two car garage.

Affiant arrived at the scene at 12:35 a.m. and found other officers and Howland's EMT Unit along with the victim's wife, Donna M. Roberts. She appeared very excited, curious and asking a

lot of questions. Affiant said to her that it appeared that he had been shot. Ms. Roberts responded saying "Shot. Oh my God someone murdered my Robert." This conversation took place in the master bedroom. Affiant at this time did not know how the victim had died. In fact, it was initially believed that Fingerhut may have committed suicide since a revolver was found in close proximity to the body.

Affiant observed the body of Fingerhut as being face down and fully clothed wearing a lined Cincinnati Reds jacket. The weapon was less than two (2) feet from the body, and there was no evidence of forced entry. Officers at the scene also noticed drops of blood found separate from the pool of blood around the body. In fact, one large drop of blood was found in the hallway near the living room.

Shortly after Affiant arrived, Dr. Humphrey Germaniuk, Forensic Pathologist of the Trumbull County Coroner's Office, arrived at the scene. He photographed the scene as did Officer Anthony Leshnack of the Trumbull County Sheriff's Department and the Trumbull County's Homicide Investigation and Prosecution Unit. Dr. Germaniuk, upon inspecting the area of the body discovered that the 38 revolver next to the victim was fully loaded. Further, upon close inspection of the body, it was determined that the victim had been shot at least three times, including one shot to the back of the head.

Dr. Germaniuk determined that the victim died of multiple gunshot wounds, and the case was ruled a homicide. He also concluded that the victim was probably engaged in a struggle with the assailant since he had suffered other injuries including lacerations, abrasions and contusions. In addition, there appeared to be gunshot residue on the victim's red jacket where one of the gunshot wounds was observed.

After determining that the victim was in fact a homicide victim, your Affiant talked to Donna Roberts a second time. She was told that it was going to take a long time to process the scene, and asked if he could contact a family member to take her from the home and that he would talk to her later. She was emotional and crying at the time. Affiant also asked her for permission to search the whole home. Donna Roberts stated "I told you do whatever you have to do, search the whole place, just find the guy." A written consent was later obtained that morning. Also Roberts informed Affiant that her husband's vehicle, a silver 2001 Chrysler 300M was missing. At approximately 2:00 a.m., Ms. Roberts left with her brother Ralph Roberts to his home in Austintown, Ohio.

During the next few hours, Affiant and other officers searched the home and garage area of the house. In the garage was Donna Roberts' vehicle, a 2000 maroon Chrysler 300M. In the trunk of Ms. Roberts' car, in a brown paper bag with the name Nate Jackson and his prison number on it, officers found 145 handwritten letters from Donna Roberts addressed to Nathaniel E. Jackson, inmate at the Lorain Correctional Institution, Grafton, Ohio. The officers also found male clothing in the bag.

In the master bedroom another 143 handwritten letters were found which were addressed to Donna M. Roberts, PO Box 1483, Warren, Ohio. They were from Nathaniel E. Jackson whose address was Lorain Correctional Institution. Affiant read some of the letters found at both locations and concluded that Donna M. Roberts and Nathaniel E. Jackson were and had been lovers for over 2 years. These letters also established that they were plotting to murder Robert Fingerhut.

After determining that Ms. Roberts was likely involved in her husband's murder, she was requested to come to the Howland Township Police station for a further interview. At 1:00 p.m. December 12, 2001, she arrived with her brothers and was interviewed by Affiant and Captain Karl



Compton. She proceeded to tell officers what she had done the day before finding her husband. She said she saw Robert last alive at 8:30 a.m. on December 11<sup>th</sup> prior to her going to work at the Grey Hound Bus Terminal, Warren, Ohio. (Her husband owned and operated the Warren and Youngstown Grey Hound facilities). She went to work and did not see him the whole day. He had gone to work in Youngstown. At 5:45 p.m. she returned home from work. Then at 9:00 p.m. she spoke to Robert and he told her that he was going to be late and that "she should go shopping at the mall and buy herself something nice because she deserves it."

She stated in part that she went to Giant Eagle, Walmart and K-Mart and that she was gone for approximately three hours shopping. She said she arrived home around mid-night and found her husband laying on the floor. She said she never touched him. She then told Affiant "You don't know something about Robert, that is, he goes both ways" (which Affiant interpreted as meaning that he was gay). She told Affiant that though she had never met his friends, there was a man named "Bobby" who had been calling a couple times a week for several weeks until last week. Furthermore, she claimed that since "Bobby" stopped calling her husband, he had been acting strange. She claimed there had been no big problems between her and her husband.

Affiant asked Ms. Roberts whether she had any boyfriends. She stated that a year or six months ago, she dated a man who was half-black and half-Hispanic named Carlos for two or three months. She said that they (meaning she and her husband) were "just a real cool couple." She did not mention any other names. Affiant then confronted her with the name Nathaniel E. Jackson. Upon hearing his name, she stated that she knew him and that she had been seeing him for two years. She had picked him up from prison on Sunday, December 9, 2001 and "had driven him home to Youngstown and dropped him off" at Oscar and Sheila's house in Youngstown, Ohio after picking

up some marijuana at her house. She next had contact with Jackson on Tuesday, December 11, 2001 when he had called her from a pay phone. Other than these two times she had not had contact with Nate. She further said that Robert knew about Nate and that they were friends.

She also mentioned that on Tuesday she had gone alone to Red Lobster and had dinner and one alcoholic beverage. After going over her story again-she remembered that she had also talked to Nate on the phone on Monday. She told Nate that she could not see him again to have sex and that she just wanted to be friends. In summary, the interview lasted one hour and Donna Roberts denied personally seeing Jackson except on Sunday morning and afternoon when she had picked him up from prison and brought him home. She was sure of that.

On Thursday, December 13, 2001, the victim's Chrysler automobile was found by Youngstown Police Department at Pershing and Victoria Streets in Youngstown, Ohio at 6:21 p.m. Affiant and Officer Frank Dillon and the Howland Police Department arrived at the above address at approximately 6:35 p.m. The car was unlocked with the keys in it. Blood drops appeared to be on the outside front passenger's door with what appeared to be blood smears on the door handle itself. Inside the car there appeared to be finger smears of blood on the front seat, and other blood stains on the headlight switch, keys, dashboard and stereo radio. This vehicle was towed to the Howland Township Police Department and then to Attorney General's B.C.I. & I. Laboratory, where Det. Sgt. Peter Pizzulo and B.C.I. Forensic Scientist Cindy Maylee processed the vehicle for fingerprints and blood-DNA evidence.

On Saturday, December 15, 2001 at 4:47 p.m., a tape recorded interview of Donna Roberts was conducted at the Howland Township Police Department by Affiant and Officer Dillion. Roberts was represented by Attorney Steve Chuparkoff. She was not in custody and voluntarily came to the



Howland Township Police station on her own accord. Further, she received a verbal and written Miranda warning and knowingly waived her constitutional rights. This interview lasted over one and one-half hours.

During this interview she contradicted her earlier statements and admitted that she had been with Nate Jackson on Sunday, Monday and Tuesday. She stated that she had stayed with him or got him a room at two different motels, the Wagon Wheel (Sunday night) on Market Street in Boardman, Ohio and the Days Inn (Tuesday night) which is also on Market Street in Boardman, Ohio. Further, she admitted that she had dinner with Jackson on the night of the shooting (December 11<sup>th</sup>) at the Red Lobster in Niles, Ohio at approximately 6:00 p.m. After eating they then went back to her house to feed her dogs and then she took him back to Oscar and Sheila's house on Wirt Street, Youngstown, Ohio. At 9:30 p.m., Roberts was in her car when Jackson called on her car phone and said that he needed her to help him and put him up for a week.

She claimed that she picked up Jackson on Wirt Street in Youngstown. When he got in her car, she stated that Jackson had a bandage over his left index finger which he said was injured with a hammer. He asked her for money and she gave him \$200.00. They then drove to a crack house in Youngstown and purchased \$100.00 worth of crack. Then she drove to the Days Inn and charged the room on her Master Card at approximately 10:30 p.m. He started to smoke crack and after a few minutes, she left him there. This was the last time she saw Jackson. Further, towards the end of the interview, she changed her story and told Affiant that Jackson, during a telephone call made after the discovery of Roberts' body, said he had been shot in the finger. She also stated that Jackson may have taken her cell phone. Further she said that "she could not believe that Jackson would ever do anything to Robert."

On Sunday, December 16, 2001, Affiant went to the Days Inn and verified that Donna Roberts had rented Room 129 for one week. A motel employee stated on Saturday, December 15, 2001, she had been cleaning the room and found used condoms, bloody dressings, wash cloths, and hydrogen peroxide. They were thrown in the trash dumpster and later retrieved by Affiant. One of the bloody medical wraps looked as if it could have been wrapped around an injured finger.

On Tuesday, December 18, 2001, B.C.I. Agent Ed Lulla went to Room 129 of the Days Inn and processed the room and found what appeared to be blood stains on the bed comforter, on wall near the door, on the floor in the bathroom, and on a wash cloth. Also fingerprints were found throughout the room.

Other evidence developed by Affiant and other police officers in this case which include officers from the Howland Township Police Department, Warren Police Department and the Trumbull County Sheriff's Department showed that lay witnesses also contradict the often self-contradicting story given by Donna Roberts. For example, Roberts told investigators that he was working late on Tuesday night and that she should go shopping. In fact, Dep. Jose Sanchez, who was working at the Youngstown Grey Hound Office with Robert Fingerhut, said that he remarked to Fingerhut that he (Fingerhut) was lucky and that he was going to get out of here on time. In fact, Fingerhut left at 9:00 p.m. It takes approximately 20-25 minutes to go from Youngstown to Howland.

Also Donna Roberts said that they were getting along well. However, an employee at the Youngstown Grey Hound business said to investigator that on Monday, December 10, 2001, Donna Roberts asked her husband for \$3,000.00 and he said no and she gave him, according to witness, she gave him "the dirtiest look, like she was out to get him." Another employee in Youngstown said that

Fingerhut and his wife had an argument a week before his death over the phone and the argument "was the worst argument he ever heard Fingerhut and Donna Roberts ever have."

Furthermore, Affiant has attached to this Affidavit, copies of letters written by Nathaniel E. Jackson and Donna Marie Roberts to each other. (Jackson letters of November 27, 2001, October 29, 2001 and October 26, 2001; Roberts letter November 26, 2001). These letters establish a conspiracy between Nathaniel E. Jackson and Donna Marie Roberts to murder Robert Fingerhut upon Jackson's release from prison on December 9, 2001.

A check into the prison status of Nathaniel E. Jackson showed that on February 22, 2001, Nathaniel Edward Jackson (DOB 02/13/1972, SSN 270-68-8663) formerly of 309 South Pearl Street, Youngstown, Ohio was sentenced for the third time to prison for two (2) counts of Receiving Stolen Property. Jackson was sentenced by the Mahoning County Common Pleas Court to a term of one (1) year at the Lorain Correctional Institution, Lorain, Ohio. On December 9, 2001 at 8:00 a.m., he was released from prison.

Examples of Roberts and Jackson's murder plot are numerous. In the Friday, October 26, 2001 letter of Jackson, he writes to Roberts that upon his release they were to get a hotel room together to spend some romantic time before killing Robert Fingerhut. (As previously present in the foregoing Affidavit-Donna Roberts did in fact before his release get a room for Jackson at the Wagon Wheel Motel in Boardman, Ohio). Jackson goes on and writes..."then after that you don't ever have to worry about making known more excusses(sic) to him, because he will no longer be with us after 12-10-01." Jackson then drew a tombstone which read:

R		P
E		I
S	IN	S
T		S

(page 2) (Emphasis added). Later on page 8, he writes:

"Hey Donna just think come 12-11-01 you'll be waking up to me or maybe we'll give it a couple of days to let things look cool an (sic) after the Funeral Baby when I come home I'm never leaving an (sic) we're only doing it like that just to make it look good...the way that I have it all planned out is so sweet an (sic) alls I need is for my Baby not to worry an (sic) leave everything else up to me..." (Emphasis added).

In his October 29, 2001 letter Jackson writes another letter to Donna and says ...(p. 1) "An as far as that Robert Problem? Yes I'm taking care of that the next night. Because I told you I'm tired of living like this when I don't have to. An (sic) After that will you get me a 2002 Cadillac DeVille? Because I dream of it a lot." (Emphasis added). (It is noted that Affiant has learned from his investigation and talking to State Farm Insurance that the victim had \$325,000 in life insurance with his wife as beneficiary.) (It is emphasized that the above letters were found in the bedroom of Donna Roberts-all letters written to her sent to a post office box in her name and not to the Fonderlac residence.

The most recent letter attached to this Affidavit is the Monday, November 26, 2001 letter written by Donna Roberts and sent to Nathaniel Jackson at the Lorain Correctional Institution. This letter was found in Donna Roberts automobile which was parked in the Fonderlac residence at the time of the homicide. Roberts addresses Jackson as "My dearest sweetheart." This letter is six (6) handwritten pages. There are many references to the murder plot in the letter. An example, Roberts state of mind on November 26<sup>th</sup> is well illustrated on page 4 which in part reads:

"...And after it's over, I can get a place for you even here in Warren for a couple weeks because who is to tell me not to? Oh-I have been all over looking for a ski mask. I only see those knitted caps. Any suggestions on who might have them? And I'm still looking for gloves because I don't think the thick ones I'm seeing are good to work with as would be thinner leather ones. Know what I mean?"



And yes, sneaking to see you for a couple hours doesn't do it. It leaves us both with no real life together and when you go your way, you have to fend for yourself and eat alone and sleep alone and be out with the wolves. And me - I (live) exist in hell on earth. Like last night - I got so sick of just looking at him. And hearing the same shit over and over. And smelling his breath. And every other little thing - it's all bad. And seeing his skin. And watching him walk - or breathe. I can't hold in my disgust and contempt for him well at all and he sees it every time he looks at me now. Which makes him feel worse about me in return. Which makes him talk to me and treat me like dirt."

Affiant further states that Trooper Gerald A. Funelli of the Ohio State Highway Patrol has obtained copies of eighteen(18) separate telephone conversations which were recorded at the Lorain Correctional Institution, an Ohio State Prison, located in Grafton Ohio. These recordings were made between October 25, 2001 and December 8, 2001 and were made from Lorain Correctional Institution to telephone number 330-609-7812, which number is associated with a telephone belonging to Donna Roberts.

Your Affiant reasonably believes that these recorded prison conversations were had between Donna Roberts and Nathaniel Jackson. During these conversations, Nathaniel Jackson, who identifies himself during the collect calls from prison, and Donna Roberts, discuss the planned murder of Robert Fingerhut. Donna Roberts made the following statements: "I can't take it anymore here," "I even gave you permission to do that to Robert to be with you forever,"

During these conversations Nathaniel Jackson states the following: "I can't wait to get out to do what has to be done," "We in this 'til death do us part," "We going to wake-up for Christmas together," (and to which Donna Roberts admits to daydreaming about the same thing); and "You would like to let him see you suck my dick before he goes away."

Finally, during the final prison conversation which was recorded on December 8, 2001, the day before Nathaniel Jackson was released from prison, the following exchange took place:

Nathaniel Jackson: "I am going to need just one thing."

Donna Roberts: "What?"

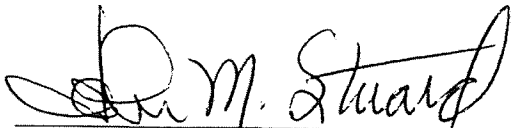
Nathaniel Jackson: "I just need to be in the house when he come home."

WHEREFORE, for the above-given reasons, Affiant truly believes that probable cause has been established to charge both DONNA ROBERTS, 254 Fonderlac, SE, Warren, OH 44484; DOB 5/22/44 and SS #293-38-1661 and NATHANIEL E. JACKSON, 309 South Pearl Street, Youngstown, Ohio; DOB 2/13/72; SS#270-68-8663 with the crimes of AGGRAVATED MURDER §2903.01(A) and AGGRAVATED BURGLARY §2911.11(A)(1)(3) and after due consideration, Affiant further prays that this Honorable Court issue upon the Prosecutor's Complaint warrants for the arrest of said DONNA MARIE ROBERTS and NATHANIEL E. JACKSON.

FURTHER AFFLIANT SAYETH NAUGHT.

  
DETECTIVE PAUL MONROE  
AFFIANT

Sworn to and subscribed before me, a Common Pleas Judge, in and for Trumbull County,  
Ohio, this *20th Day of December, 2001*

  
HONORABLE JOHN M. STUARD  
JUDGE, COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO



TRUMBULL COUNTY COMMON PLEAS COURT  
GENERAL DIVISION

**ARRAIGNMENT FORM**

CASE NUMBER: 2001 CR 00794

JUDGE: HON. JOHN M. STUARD

ATTORNEY OF RECORD AT TIME OF ARRAIGNMENT:

STATE OF OHIO

VS.

**NATHANIEL E JACKSON**

Entered a plea of: Not Guilty

Indicted for: AGGRAVATED MURDER

RECEIVED  
CLERK OF COURT  
TRUMBULL COUNTY  
OHIO  
DEC 21 11 34 AM '01

\* \* \* \* \*

TO: Thomas Altieri, Sheriff of Trumbull County

Whereas Defendant **NATHANIEL E JACKSON** has this day appeared in court and was indicted for **AGGRAVATED MURDER**.

You are ordered to accept the said prisoner and retain him/her in your custody pending the posting of bond in the sum of:

no bond

Pre-trial Date: 12/31/01

Judge: John M. Stuard

Date: 12/21/01

01-CR-794  
DIRECT PRESENTMENT

**INDICTMENT**  
Crim R. 6, 7

AGGRAVATED MURDER (F)  
WITH SPECIFICATIONS OF  
A G G R A V A T I N G  
C I R C U M S T A N C E S  
(2903.01(A), 2941.14(C), and  
2929.04(A)(7))

THE STATE OF OHIO )

TRUMBULL ..... COUNTY, ss.)

**COURT OF COMMON PLEAS**

**Of the Term September, in the year two thousand one,**

*THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present that on or about the 11<sup>th</sup> day of December, 2001, at Trumbull County, Ohio, NATHANIEL E. JACKSON, did purposely, and with prior calculation and design, cause the death of Robert S. Fingerhut, age 56,*

SPECIFICATION #1 TO COUNT ONE: Aggravating Circumstance of Aggravated Burglary (2929.04(A)(7))

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code section 2929.04(A)(7) that the offense was committed while **NATHANIEL E. JACKSON** was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and **NATHANIEL E. JACKSON** was the principal offender in the commission of the Aggravated Murder.

You are hereby notified that you are under indictment for a felony of violence and pursuant to Section 2923.13 of the Ohio Revised Code you are prohibited from acquiring, having, carrying, or using any firearm or dangerous ordnance while under indictment.

Case No. 01-CR-794 - DIRECT PRESENTMENT  
Defendant JACKSON, Nathaniel E.

Page 1 of 6

SPECIFICATION #2 TO COUNT ONE: Aggravating Circumstance of Aggravated Robbery (2929.04(A)(7)

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code section 2929.04(A)(7) that the offense was committed while **NATHANIEL E. JACKSON** was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and **NATHANIEL E. JACKSON** was the principal offender in the commission of the Aggravated Murder.

in violation of the Ohio Revised Code, Title 29, Section 2903.01(A), 2941.14(C), and 2929.04(A)(7), *and against the peace and dignity of the State of Ohio.*

**COUNT 2: AGGRAVATED MURDER (F) WITH SPECIFICATIONS OF AGGRAVATING CIRCUMSTANCES (2903.01(B), 2941.14(C), and 2929.04(A)(7))**

*THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County aforesaid*, on their oaths, in the name and by the authority of the State of Ohio, do find and present that on or about the **11<sup>th</sup> day of December, 2001**, at Trumbull County, Ohio, **NATHANIEL E. JACKSON**, did purposely cause the death of Robert S. Fingerhut, age 56, while committing or attempting to commit, or while fleeing immediately after committing or attempting to commit, Aggravated Burglary and/or Aggravated Robbery,

**SPECIFICATION #1 TO COUNT TWO: Aggravating Circumstance of Aggravated Burglary (2929.04(A)(7))**

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code section 2929.04(A)(7) that the offense was committed while **NATHANIEL E. JACKSON** was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and **NATHANIEL E. JACKSON** was the principal offender in the commission of the Aggravated Murder.

**SPECIFICATION #2 TO COUNT TWO: Aggravating Circumstance of Aggravated Robbery (2929.04(A)(7))**

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code section 2929.04(A)(7) that the offense was committed while **NATHANIEL E. JACKSON** was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and **NATHANIEL E. JACKSON** was the principal offender in the commission of the Aggravated Murder.

in violation of Section 2903.01(B), 2941.14(C), and 2929.04(A)(7) of the Ohio Revised Code, *and against the peace and dignity of the State of Ohio.*

You are hereby notified that you are under indictment for a felony of violence and pursuant to Section 2923.13 of the Ohio Revised Code you are prohibited from acquiring, having, carrying, or using any firearm or dangerous ordnance while under indictment.

Case No. 01-CR-794 - DIRECT PRESENTMENT  
Defendant JACKSON, Nathaniel E.

Page 3 of 6

**COUNT 3: AGGRAVATED BURGLARY (F1) WITH FIREARM SPECIFICATION**

*THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County aforesaid*, on their oaths, in the name and by the authority of the State of Ohio, do find and present that on or about the **11<sup>th</sup> day of December, 2001**, at Trumbull County, Ohio, **NATHANIEL E. JACKSON**, by force, stealth, or deception, did trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, to-wit: 254 Fonderlac, Howland Township, Ohio, when Robert S. Fingerhut, age 56, was present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure any criminal offense, and **NATHANIEL E. JACKSON** did inflict, or attempted or threatened to inflict physical harm on Robert S. Fingerhut, and **NATHANIEL E. JACKSON** did have a deadly weapon or dangerous ordnance on or about his person or under his control,

**SPECIFICATION #1 TO COUNT THREE: Firearm Specification (2941.145)**

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code 2941.145 that the said **NATHANIEL E. JACKSON** did at the time of his commission of the crime of Aggravated Burglary have a firearm on or about his person or under his control, and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense, said firearm being defined in Section 2923.11 of the Revised Code, in violation of Section 2911.11(A)(1)(2) and 2941.145 of the Ohio Revised Code, *and against the peace and dignity of the State of Ohio.*

You are hereby notified that you are under indictment for a felony of violence and pursuant to Section 2923.13 of the Ohio Revised Code you are prohibited from acquiring, having, carrying, or using any firearm or dangerous ordnance while under indictment.



**COUNT 4: AGGRAVATED ROBBERY (F1) WITH FIREARM SPECIFICATION**

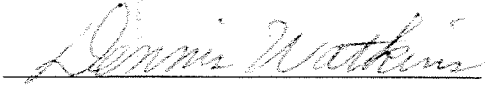
*THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County aforesaid*, on their oaths, in the name and by the authority of the State of Ohio, do find and present that on or about the **11<sup>th</sup> day of December, 2001**, at Trumbull County, Ohio, **NATHANIEL E. JACKSON**, in attempting or committing a theft offense, as defined in section 2913.01 of the Revised Code, or in fleeing immediately after the attempt or offense, did have a deadly weapon on or about his person or under his control, and either displayed the weapon, brandished it, indicated that he possessed it, or used it, and **NATHANIEL E. JACKSON** did inflict, or attempt to inflict, serious physical harm on Robert S. Fingerhut, age 56,

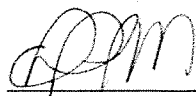
**SPECIFICATION #1 TO COUNT FOUR: Firearm Specification (2941.145)**

THE GRAND JURORS further find and specify pursuant to Ohio Revised Code 2941.145 that the said **NATHANIEL E. JACKSON** did at the time of his commission of the crime of Aggravated Robbery have a firearm on or about his person or under his control, and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense, said firearm being defined in Section 2923.11 of the Revised Code,

in violation of Section 2911.01(A)(1)(3) and 2941.145 of the Ohio Revised Code, *and against the peace and dignity of the State of Ohio.*

You are hereby notified that you are under indictment for a felony of violence and pursuant to Section 2923.13 of the Ohio Revised Code you are prohibited from acquiring, having, carrying, or using any firearm or dangerous ordnance while under indictment.

  
Dennis Watkins, Prosecuting Attorney

  
Charles L. Morrow, Asst. Pros. Attorney



01-CR-794  
DIRECT PRESENTMENT  
September Eighth Term, 2001  
**COMMON PLEAS COURT**  
TRUMBULL COUNTY, OHIO

**THE STATE OF OHIO**

vs.

NATHANIEL E. JACKSON

c/o Trumbull County Jail

Warren, OH 44481

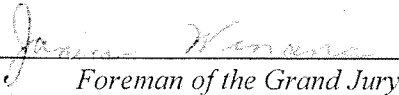
SSN: 270-68-8663; DOB: 02/13/72

Indictment for: CT 1: AGG MURDER (F) W/SPECS  
OF AGG CIRCUMSTANCES (2903.01(A),  
2941.14(C), and 2929.04(A)(7);  
CT 2: AGG MURDER (F) W/SPECS OF AGG  
CIRCUMSTANCES (2903.01(B), 2941.14(C), and  
2929.04(A)(7);  
CT 3: AGG BURGLARY (F1) W/FIREARM SPEC  
(2911.11(A)(1)(2) and 2941.145;  
CT 4: AGG ROBBERY (F1) W/FIREARM SPEC  
(2911.01(A)(1)(3) and 2941.145

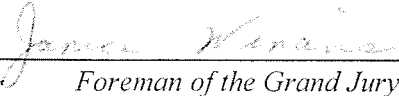


Prosecuting Attorney

**A TRUE BILL**

  
Foreman of the Grand Jury

This Bill of Indictment found upon testimony sworn and sent before  
the Grand Jury at the request of the Prosecuting Attorney

  
Foreman of the Grand Jury

Filed \_\_\_\_\_, 20\_\_\_\_

Clerk

By \_\_\_\_\_

Deputy

On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

the within named \_\_\_\_\_

Defendant was arraigned, and pleads

\_\_\_\_\_ guilty to this indictment

Clerk

By \_\_\_\_\_

Deputy

**The State of Ohio**  
**Trumbull County.**

I, the undersigned, Clerk of the Court of  
Common Pleas in and for said County, do hereby  
certify that the foregoing is a full, true, and correct  
copy of the original indictment, with endorsements  
thereon, now on file in my office.

WITNESS my hand and seal of said Court at,  
Warren,

Ohio, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Clerk

By \_\_\_\_\_

Deputy

RETURN

**S U M M O N S   O N   I N D I C T M E N T**  
RULE 9 (B)

TRUMBULL COUNTY COMMON PLEAS COURT  
WARREN, OHIO    44481

**THE STATE OF OHIO**  
PLAINTIFF

CASE NO. 2001 CR 00794

VS.

**NATHANIEL E JACKSON**  
DEFENDANT

TO:        **THOMAS ALTIERE, SHERIFF**

An Indictment, a copy of which is attached hereto, has been  
filed in the Trumbull County Court of Common Pleas charging

**NATHANIEL E JACKSON with: CT 1: AGG MURDER (F) W/SPECS OF AGG  
CIRCUMSTANCES CT 2: AGG MURDER (F) W/SPECS OF AGG CIRCUMSTANCES CT 3:  
AGG BURGLARY (F1)W/FIREARM SPEC CT 4: AGG ROBBERY (F1) W/FIREARM SPEC**

You are commanded to summon **NATHANIEL E JACKSON**, said Defendant to  
appear before said court at Trumbull County Common Pleas Courthouse,  
before **Judge John M. Stuard on Monday, December 31, 2001 at 11:00 a.m.**

Said Defendant is hereby informed that HE may be arrested if HE  
fails to appear at the time and place stated herein.

Special instructions to the executing officer:

**Defendant must appear for arraignment. No waivers accepted.**

Given under my hand and the seal of said  
Court this December 28, 2001.

**MARGARET R. O'BRIEN, Clerk of Courts**

Trumbull County, Ohio

Rochelle Ryan  
Deputy Clerk

10.11.01 12:00 PM

RECEIVED  
CLERK OF COURTS  
TRUMBULL COUNTY, OHIO

546 A

**RETURN**

Received this writ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_  
 at \_\_\_\_\_ o'clock \_\_\_\_m., and on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_  
 I served the same on the within named by \_\_\_\_\_

**RETURN OF SERVICE OF SUMMONS (PERSONAL)**

Fees \_\_\_\_\_ I received this summons on 12-28 2001  
 Service \$ 2- at 3:51 o'clock P.m., and made personal service o  
 Mileage \_\_\_\_\_ upon Nathaniel Jackson  
 Total \$ 2- by locating him-them and tendering a copy of summons  
 Date: 12-31/01 accompanying documents, on 12-28, 2001

J. J. Altieri  
 Sheriff, Bailiff, Process Ser

By J. J. Altieri Dep

**RETURN OF SERVICE OF SUMMONS (RESIDENCE)**

Fees \_\_\_\_\_ I received this summons on \_\_\_\_\_ 20\_\_\_\_  
 Service \$ \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_m., and made residence service  
 Mileage \_\_\_\_\_ it upon the defendant(s) \_\_\_\_\_  
 Total \$ \_\_\_\_\_  
 Date: \_\_\_\_\_ by leaving, at this their usual place of residence wi

a person of suitable age and discretion then residing  
 therein, a copy of the summons and accompanying docume  
 on \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
 Sheriff, Bailiff, Process Ser

By \_\_\_\_\_ Dep

**RETURN OF SERVICE OF SUMMONS (FAILURE OF SERVICE)**

Fees \_\_\_\_\_ I received this summons on \_\_\_\_\_ 20\_\_\_\_  
 Service \$ \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_m., with instructions to make  
 Mileage \_\_\_\_\_ personal-residence service upon the defendant(s) \_\_\_\_\_  
 Total \_\_\_\_\_  
 Date \_\_\_\_\_

and I was unable to serve a copy of the summons upon \_\_\_\_\_  
 \_\_\_\_\_ for the following reasons: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_  
 Sheriff, Bailiff, Process Ser

By \_\_\_\_\_ Dep

IN THE COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO

STATE OF OHIO ) CASE NO. 01-CR-794 - DIRECT  
 )  
Plaintiff ) Doc. \_\_\_\_\_ Page \_\_\_\_\_  
 )  
-vs- )  
 )  
NATHANIEL E. JACKSON, )  
c/o Trumbull County Jail )  
Warren, OH 44481 ) PRECIPE FOR CAPIAS  
 )  
Defendant )

TO THE CLERK OF COURTS:

Issue Capias for Defendant.

Dec. 28, 2001  
Dated

Dennis Watkins  
DENNIS WATKINS, #0009949  
Prosecuting Attorney  
Trumbull County, Ohio

SEPTEMBER EIGHTH TERM, 2001

CHARGE: CT 1: AGG MURDER (F) W/SPECS OF AGG CIRCUMSTANCES  
(2903.01(A), 2941.14(C), AND 2929.04(A) (7); CT 2: AGG MURDER  
(F) W/SPECS OF AGG CIRCUMSTANCES (2903.01(B), 2941.14(C), AND  
2929.04(A) (7); CT 3: AGG BURGLARY (F1) W/FIREARM SPEC  
(2911.11(A) (1) (2) AND 2941.145; CT 4: AGG ROBBERY (F1)  
W/FIREARM SPEC (2911.01(A) (1) (3) AND 2941.145)

RADIUS: 1

Filed: \_\_\_\_\_, 2001

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
By:

12-28-01 Issued

TRUMBULL COUNTY COMMON PLEAS COURT

GENERAL DIVISION

**ARRAIGNMENT FORM**

CASE NUMBER: 2001 CR 00794

JUDGE: HON. JOHN M. STUARD

ATTORNEY OF RECORD AT TIME OF ARRAIGNMENT: ANTHONY V. CONSOLDANE

STATE OF OHIO

vs.

**NATHANIEL E JACKSON**

Entered a plea of: Not Guilty

Indicted for: AGGRAVATED MURDER

\* \* \* \* \*

TO: Thomas Altieri, Sheriff of Trumbull County

Whereas Defendant **NATHANIEL E JACKSON** has this day appeared in court and was indicted for **AGGRAVATED MURDER**.

You are ordered to accept the said prisoner and retain him/her in your custody pending the posting of bond in the sum of:

no bail

Pre-trial Date: 1/30/01

Judge:

J. M. Stuard

Date:

12/31/01

MAILED  
DEC 31 12 11 PM '01  
RICCARDO  
VOL. 1000



CAPIAS

RECEIVED  
SHERIFF'S OFFICE

THE STATE OF OHIO.  
TRUMBULL COUNTY

Dec 28 3 21 PM '01

STATE OF OHIO

CASE: 2001 CR 00794

VS.

**NATHANIEL E JACKSON**

TRUMBULL COUNTY JAIL  
WARREN, OHIO 44481

TO THE SHERIFF OF SAID COUNTY, GREETINGS:

WE COMMAND YOU TO TAKE **NATHANIEL E JACKSON**

AND SAFELY KEEP, SO THAT YOU HAVE HIM BEFORE THE JUDGE OF COMMON PLEAS  
AT THE COURT HOUSE IN SAID COUNTY TO ANSWER UNTO THE STATE OF OHIO,  
ON AN INDICTMENT EXHIBITED AGAINST HIM FOR

CT 1: AGG MURDER (F) W/SPEC OF AGG CIRCUMSTANCES CT 2: AGG MURDER (F)  
W/SPEC OF AGG CIRCUMSTANCES CT3: AGG BURGLARY (F1) W/FIREARM  
SPEC CT 4: AGG ROBBERY (F1) W/FIREARM SPEC RADIUS:1

AND HAVE YOU THEN AND THERE THIS WRIT.

WITNESS MY HAND AND THE SEAL  
OF SAID COURT, THIS December 28, 2001

**MARGARET O'BRIEN** CLERK

BY: **ROCHELLE RYAN**

DEPUTY CLERK

THE STATE OF OHIO

RECEIVED THIS WRIT Dec. 28 A.D. 2001

AT 1609 O'CLOCK P M., AND I HAVE

ARRESTED THE SAID

**FEES**

SERVICE.....\$ \_\_\_\_\_

MILEAGE..... \_\_\_\_\_

CONVEYANCE.. \_\_\_\_\_

ASSISTANTS.. \_\_\_\_\_

SUSTENANCE.. \_\_\_\_\_

RETURN..... \_\_\_\_\_

TOTAL \$ \_\_\_\_\_

Dep. J. M. Ryan SHERIFF



CASE NUMBER: 01-CR-794 - DIRECT PRESENTMENT

NAME: NATHANIEL E. JACKSON

ADDRESS: C/O TRUMBULL COUNTY JAIL  
WARREN, OH 44481

RADIUS: 1

DESCRIPTIVE DATA OF PERSON WANTED ON THE ENCLOSED WARRANT:

CHARGE: CT 1: AGG MURDER (F) W/SPECS OF AGG CIRCUMSTANCES  
(2903.01(A), 2941.14(C), AND 2929.04(A)(7); CT 2: AGG MURDER  
(F) W/SPECS OF AGG CIRCUMSTANCES (2903.01(B), 2941.14(C), AND  
2929.04(A)(7); CT 3: AGG BURGLARY (F1) W/FIREARM SPEC  
(2911.11(A)(1)(2) AND 2941.145; CT 4: AGG ROBBERY (F1)  
W/FIREARM SPEC (2911.01(A)(1)(3) AND 2941.145)

DOB: 02/13/72 SOCIAL SECURITY NO.: 270-68-8663

AGE: HT.: WT.: SEX: MALE

COMPLEXION:

RACE: BLACK

EYES: HAIR:

SCARS, MARKS, TATTOOS, ETC.:

EMPLOYER:

SHIFT: DEPT.:

YEAR & MAKE OF AUTO:

COLOR:

REGISTRATION NO.:

STATE:

LIC. NO.:

NAME OF COMPLAINANT: DET MONROE - HOWLAND TWP POLICE DEPT

ADDRESS:

REMARKS:

## THE SUPREME COURT OF OHIO

In the Common Pleas Court of Trumbull County**Appointment of Trial Counsel in a Capital Case**

This form is used pursuant to Rule 20 of the Rules of Superintendence for the Courts of Ohio to report the appointment of trial counsel where the defendant is indigent, counsel is not privately retained by or for the defendant, and the death penalty can be or has been imposed upon the defendant. **Return this form within two weeks of appointment to: Nan Cairney, Supreme Court of Ohio, 30 E. Broad Street, Third Floor, Columbus, OH 43266-0419. A copy of the indictment must be attached.**

Defendant's Name: Nathaniel E. Jackson Case No. 01-CR-794Trial Judge: John M. Stuard Atty. Registration No. 0018610**Lead Counsel**Name: Anthony V. ConsoldaneAtty. Reg. No. 0000671Address: 328 Mahoning Ave. N.W.Warren, OH 44483Telephone: 330-393-7727

Certified under Sup.R. 20 as:

Lead Counsel XCo-Counsel XAppellate Counsel XDate of Appointment: 12-28-01**Co-Counsel**Name: James F. LewisAtty. Reg. No. 0024314Address: 328 Mahoning Ave. N.W.Warren, OH 44483Telephone: 330-393-7727

Certified under Sup.R. 20 as:

Lead Counsel XCo-Counsel XAppellate Counsel Date of Appointment: 12-28-01**ATTORNEY CERTIFICATION**

We hereby accept appointment as trial counsel in this case, affirm that we are currently certified under Sup.R. 20 to accept appointment as lead counsel or co-counsel, and certify that this appointment will not create a total workload so excessive that it interferes with or prevents the rendering of quality representation in accordance with constitutional and professional standards.

Anthony V. Consoldane  
Lead Counsel

Date: 01-02-02

James F. Lewis  
Co-Counsel

Date: 01-02-02

In the Court of Common Pleas of Trumbull County

State of Ohio,	:	
Plaintiff,	:	
	:	Notice to Supreme Court of
v.	:	Ohio of Filing of Indictment
	:	Charging Aggravated Murder
NATHANIEL E JACKSON	:	with Specification(s) of
Defendant.	:	Aggravating Circumstances
	:	[R.C. 2929.021(A)]

Name of defendant: **NATHANIEL E JACKSON**

The court in which the case will be heard:

**JUDGE JOHN M STUARD**

Case number(s): **2001CR794**

Date on which indictment was filed:

**DECEMBER 28 2001**

MAILED  
JAN 4 1 42 PM '02  
RECORDED  
PAGE

Margaret R. O'Brien  
Clerk of Courts of Trumbull County

Date: January 4, 2002

1-4-02 Sent to Supreme Court

3A

First Assistant  
JAMES J. MISOCKY

Chief — Civil Division  
JAMES T. SAKER

Chief — Criminal Division  
CHARLES L. MORROW

Senior Trial Attorneys  
KENNETH N. BAILEY  
CHRISTOPHER D. BECKER

Administrator — Criminal Division  
DIANE L. BARBER

Chief — Appellate Division  
LUWAYNE ANNOS



DENNIS WATKINS

*Trumbull County Prosecuting Attorney*

4th FLOOR ADMINISTRATION BUILDING  
160 HIGH STREET N.W. WARREN, OHIO 44481-1092  
PHONE: (330) 675-2426 • FAX: (330) 675-2431

Civil Division  
JAMES M. BRUTZ  
JASON C. EARNHART

Criminal Division  
STANLEY A. ELKINS  
JENNIFER CARROLL KIRR  
DAVID M. TOEPFER

Child Assault Division  
THOMAS C. WRENN, CHIEF  
SARAH T. KOVOOR

Juvenile Division  
SEAN J. O'BRIEN  
Child Support Division  
DAVID E. BOKER, CHIEF  
DONALD W. HILL

Investigators  
RALPH E. MARCHIO  
SUE ELLEN STINEDURF  
JAMES L. TEEPLE

**VICTIMS' RIGHTS NOTIFICATION**

(Pursuant to Order of the Trumbull County Common Pleas Court)

**DEFENDANT** NATHANIEL E. JACKSON **CHARGE** \* SEE ATTACHMENT

**CASE NUMBER** 01-CR-794 **JUDGE** STUARD

**DATE OF INDICTMENT** 12/28/01 **PROSECUTOR** WATKINS

Dear Mr. Fingerhut:

The Trumbull County Grand Jury has returned and indictment against the defendant in the above case. Resolution in this case may be by a guilty plea or trial.

The Trumbull County **Victim/Witness Division** is here to assist you in the criminal justice process. As a victim in this case, you have the following rights:

1. The right to notification of plea, trial and/or sentencing date and time.
2. If you suffered physical harm or job wage loss because of this crime, you may be eligible for Crime Victims Compensation. This fund can be tapped once other insurance benefits have been exhausted, when the crime is reported within 72 hours, and when you as the victim have cooperated with local law enforcement officers in solving the crime.
3. The right to notification of shock parole, shock probation, parole or early release - if any - providing you notify such desire, in advance, to the Ohio Adult Parole Authority and our office.
4. The right to submit a written Victim Impact Statement which, if given, will assist the Court in passing sentence.
5. The right to make an oral statement at sentencing in open court which, if given, will be sent to the Ohio Adult Parole Authority at 1050 Freeway Drive, Columbus, OH 43229.

It is the duty of our office to assist you in exercising the above rights. In order to receive our services it is **your responsibility** to return the enclosed **Response Form**. Failure to return this form indicates that you do not desire the services of the Victim/Witness Division. Please review our enclosed brochures. If you have any questions, you may contact us at (330)675-2551.

**\*NOTE: YOU DO NOT HAVE TO RETURN  
A RESPONSE FORM.**

MARY JO HOSO  
Administrator  
Victim/Witness Division

Warren Ohio 44483

IN THE COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO

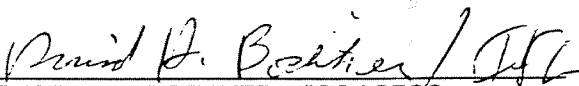
STATE OF OHIO, ) Case No. 01-CR-794  
)  
Plaintiff, )  
VS. )  
)  
) Judge Stuard  
NATHANIEL JACKSON, )  
)  
Defendant. )

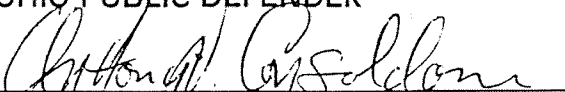
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DEFENDANT'S MOTION FOR BILL OF PARTICULARS

Defendant, through counsel, respectfully moves this Honorable Court pursuant to Ohio Rule of Criminal Procedure 7(E) for an order requiring the State of Ohio to furnish a Bill of Particulars setting forth specifically the nature of the offense charged in the indictment. The exact nature of this request is set forth in the accompanying Memorandum.

Respectfully submitted,

  
DAVID H. BODIKER #0016590  
OHIO PUBLIC DEFENDER

  
ANTHONY W. CONSOLDANE #0000761  
ASSISTANT STATE PUBLIC DEFENDER  
LEAD COUNSEL

  
JAMES F. LEWIS #0024314  
ASSISTANT STATE PUBLIC DEFENDER  
CO-COUNSEL

BRANCH OFFICE OF THE OHIO PUBLIC DEFENDER  
328 Mahoning Avenue

9A



Warren, Ohio 44483  
(330)393-7727 FAX (330)393-7076

COUNSEL FOR NATHANIEL JACKSON

MEMORANDUM IN SUPPORT

The Defendant is charged with: Count I of Aggravated Murder with specifications of Aggravated Circumstances, i.e. specification to Count I of Aggravated Burglary and specification 2 of Count I of Aggravated Robbery. Count 2 of Aggravated Murder with specifications of Aggravated Circumstances, i.e. specification to Count 2 of Aggravated Burglary and specification 2 of Count 2 of Aggravated Robbery. Count 3 of Aggravated Burglary with Firearm specifications, i.e. specification to Count 3 of a Firearm specification. Count 4 of Aggravated Robbery with Firearm specifications, ie specification to Count 4 of a Firearm specification. His life is literally on the line. In order to ensure that his constitutional, statutory and procedural rights are scrupulously honored, he asks that the State provide his counsel with a detailed Bill Of Particulars which includes but is not limited to:


1. A detailed statement of the particular acts, conduct, method, manner or means by which the State of Ohio maintains that the Defendant committed the offenses and specifications set out in the indictment.
2. The time and place of the conduct Defendant allegedly engaged in which forms the basis for the indicted charges.

The indictment is vague, indefinite, uncertain and insufficient in its terms and conclusions to reasonably notify the Defendant of the nature of

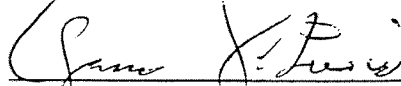


the charges against him. Without reasonable notification, the Defendant will be unable to effectively prepare his defense. Notification is necessary to preserve Defendant's statutory, procedural and constitutional rights to Due Process, Effective Assistance of Counsel and a Fair Trial. Ohio Const. art. I, §§ 10 and 16; U.S. Const. amend. V, VI, and XIV.

Respectfully submitted,

  
DAVID H. BODIKER #0016590  
OHIO PUBLIC DEFENDER

ANTHONY V. CONSOLDANE #0000761  
ASSISTANT STATE PUBLIC DEFENDER  
LEAD COUNSEL

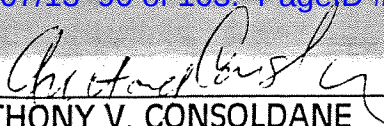
  
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CO-COUNSEL

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328 Mahoning Avenue  
Warren, Ohio 44483  
(330)393-7727 FAX (330)393-7076

COUNSEL FOR NATHANIEL JACKSON

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing DEFENDANT'S MOTION FOR BILL OF PARTICULARS was delivered to the Prosecutor's Office, 160 High Street, Warren, Ohio, 44481, on this 7th day of January, 2002.

  
\_\_\_\_\_  
ANTHONY V. CONSOLDANE  
Attorney for Defendant

2

IN THE COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO

STATE OF OHIO,	)	Case No. 01-CR-794
	)	
Plaintiff,	)	
	)	
VS.	)	
	)	
	)	Judge Stuard
NATHANIEL JACKSON ,	)	
	)	
Defendant.	)	

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DEFENDANT'S DEMAND FOR DISCOVERY

Defendant, through counsel hereby requests, pursuant to Rule 16, Ohio Rules of Criminal Procedure, that the Prosecuting Attorney provide discovery as required by Ohio R. Crim. P. 16, the Fifth and Fourteenth Amendments of the U.S. Constitution, and Article I, Sections 10 and 16 of the Ohio Constitution, including but not limited to all of the following matters as they apply to the instant case:

1. Rule 16(B)(1)(a). Statement of Defendant or Co-Defendant. Any relevant written or recorded statement or statements made by the Defendant or Co-Defendant, or copies thereof; and any written summaries of any oral statements, or copies thereof, made by the Defendant or the Co-Defendant to a Prosecuting Attorney or a law enforcement officer which are available to or within the possession, custody, or control of the State, the existence of which are known or may by the exercise of due diligence become known, to the Prosecuting Attorney; and recorded

9.8

testimony of the Defendant or Co-Defendant before a grand jury.

1.01 This request includes any and all statements made by any non-defendant co-conspirators which would be admissible against the Defendant under Ohio R. Evid. 801(D)(2)(E). See United States v. Roberts, 793 F. 2d 580 (4th Cir. 1986).

1.02 This request also includes summary reports and interview memoranda made by government agents merely setting forth the substance of the remarks made by the Defendant. See United States v. Johnson, 525 F.2d 999 (2d Cir. 1975), cert. denied, 424 U. S. 920 (1976).

1.03 If the Prosecuting Attorney does not know of the existence of any written or recorded statements as requested above at the time of the request, then the Defendant, through counsel, hereby requests that the Prosecuting Attorney make a demand on the agency responsible for the investigation to search its files and to otherwise exercise due diligence, to determine if any such statements exist. This request includes, but is not limited to, an interview by the Prosecuting Attorney of each of the investigating officers to determine whether any such statements exist. See United States v. Jensen, 608 F.2d 1349 (10th Cir. 1979); United States v. James, 495 F.2d 434 (5th Cir. 1974), cert. denied, 419 U. S. 899 (1974).

2. Rule 16(B)(1)(b). Defendant's Prior Record. A copy of Defendant's prior record, if any.
3. Rule 16(B)(1)(c). Documents and Tangible Objects. A list of any books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof, available to or within the possession, custody, or control of the State, which are material to the preparation of the defense, or are intended for use by the Prosecuting Attorney as evidence at trial, or which were

obtained from or belonged to Defendant, and copies of those items which can be readily reproduced.

3. 01 In addition to the list of documents and tangible objects requested above, the Defendant, through counsel, hereby requests the opportunity to inspect and examine any and all such items.

3. 02 Defendant's request includes, but is not limited to, the following objects:

a. All photographs used by law enforcement officers for the purpose of obtaining an identification of the Defendant, or co-defendant, or others. This request includes individual photographs and/or photograph analysis used by law enforcement officers during the investigation of this case;

b. All items seized or discovered by any and all searches conducted with respect to the investigation of this case, including any inventory search of the Defendant upon his arrest; or any search of his dwelling or automobiles which belonged to him or his family or were in his possession or available for his use;

c. All documents relating to any inventory of items seized or taken or to used as evidence in this case; and

d. All written and recorded statements made by co-conspirators or other witnesses since they constitute documents which are material to the preparation of the defense and are, therefore, discoverable pursuant to Ohio R. Crim. P. 16(B)(1)(c).

4. Rule 16(B)(1)(d). Reports of Examination and Tests. A list of any results or reports of physical or mental examinations and any scientific experiments made in connection with this particular case which are available to or within



the possession, custody or control of the State, the existence of which are known or may by the exercise of due diligence become known to the Prosecuting Attorney, and copies of those items which may be readily reproduced.

4.01 In addition to the list of results and/or reports requested above, the Defendant, through counsel, hereby requests the opportunity to inspect and examine any and all such results or reports.

4.02 The Defendant requests that the results or reports include a written description of the methods of testing utilized in obtaining any and all results.

4.03 The results and/or reports requested above include, but are not limited to:

- a. Polygraph examinations conducted upon potential government witnesses, giving the date, time, place, and identity of the person examined, along with the results thereof.

- b. The existence of latent fingerprints, procedures utilized in obtaining latent lifts and conclusions reached concerning identity of individuals based upon this investigation.

- c. Tests and procedures utilized in determining identity and quality of any suspected or alleged contraband substance, including drugs or narcotics, scheduled or unscheduled.

- d. Results and procedures utilized in any analysis pertaining to handwriting identification.

- e. Results and procedures utilized in any analysis pertaining to voice identification.

- f. Results and procedures utilized in any analysis pertaining to eyewitness



identification line-ups, photo-arrays, show-ups, and other procedures.

g. Results and procedures utilized in any firearms or tool-mark tests or examinations.

h. Requests, results and procedures utilized in any chemical analysis of any substance connected in any way with the charges set forth in the indictment.

i. Results and procedures utilized in the examination of any evidence connected with the charges set forth in the indictment.

5. Rule 16(B)(1)(e). Witnesses' Names and Addresses; Record. A written list of all witnesses, with the witnesses the Prosecutor intends to call at trial specifically identified. The list should include names, addresses and any prior felony convictions of any such witnesses, when such record is within the knowledge of the Prosecuting Attorney.

5.01 The addresses of the witnesses given should include their residence address. If the residence is an apartment dwelling, then the apartment number is also requested. If an office address is also given, then the suite number of the office is requested.

6. Rule 16(B)(1)(f). Fifth, Sixth, and Fourteenth Amendments to the United States Constitution. Evidence, Favorable to the Defendant. All evidence known, or which may become known, to the Prosecuting Attorney favorable to Defendant, and material either to guilt or punishment.

6.01 In light of the particularity requirement set forth in United States v. Agurs, 427 U.S. 97 (1976), the Defendant hereby specifically requests the following:

- a. Prior felony and misdemeanor convictions and/or juvenile adjudications

for all witnesses expected to be called by the government.

b. Specific incidents of misconduct, "bad acts," by all witnesses expected to be called by the government, whether or not such conduct resulted in a criminal conviction.

c. Disclosure by the government of any and all consideration it has held out to a witness to encourage that witness's cooperation with the government. This request includes, but it not limited to: grants or promises of immunity; confirmed or tentative plea bargaining; monetary compensation; assistance in avoiding prosecution in other jurisdictions; omission from being named in an indictment or as an unindicted co-conspirator; any other considerations, regardless of their nature, granted, promised, suggested, or implied, which contemplate lenience or preferential treatment in exchange for cooperation with the government.

d. The existence of pending criminal charges, either felony, misdemeanor or juvenile, as well as parole or probation status of any and all witnesses the government expects to call.

e. The disclosure of the utilization of any line-up or show-up procedures or photographic arrays conducted in the investigation of the case; and the time, date, place, and all participants in these proceedings, as well as the particular law enforcement agency conducting same.

f. The results of any line-up, show-up, or photographic identification proceedings as conducted by law enforcement agencies, as well as all descriptions given by witnesses regarding the identification of the

Defendant hereby requests Defendant or any other alleged perpetrators.

g. Statements or summaries of statements from government witnesses and individuals the government does not intend to call as witnesses, obtained by law enforcement agencies which include references to the Defendant's lack of involvement concerning the commission of each alleged offense.

h. The disclosure of the psychiatric background of all witnesses the government expects to call at trial.

i. Any information tending to show that other persons, excluding the accused, were or could have been involved in the crime.

j. Any statements of witnesses which conflict either internally or with another statement of the same witness.

k. The names and addresses of any individuals who were considered at any time as possible suspects and the evidence that led to this conclusion.

l. Any statement of any witness or other individual which presents or indicates a doubt as to the identity of the accused, or to any element of the charge.

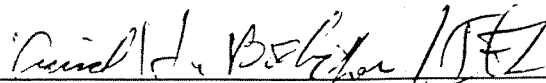
m. Any polygraph tests which raise some doubt as to any State witness's credibility.

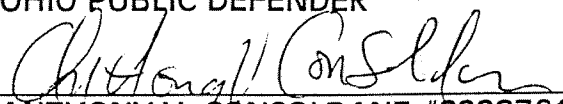
n. Any evidence, information or material of any kind which does or could mitigate the punishment meted out to the Defendant, including but not limited to matters pertaining to the differences between the culpability of co-defendants with respect to the criminal acts with which they have been charged.


CERTIFICATE OF SERVICE

The Defendant hereby requests the prosecution to check its files (including material physically located in the files of the police conducting the investigation), and to interview all agents of the government involved in the investigation to determine whether the discovery materials requested above exist.

Respectfully submitted,

  
DAVID H. BODIKER #0016590  
OHIO PUBLIC DEFENDER

  
ANTHONY V. CONSOLDANE #0000761  
ASSISTANT STATE PUBLIC DEFENDER  
LEAD COUNSEL

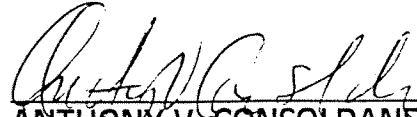
  
JAMES F. LEWIS #0024314  
ASSISTANT STATE PUBLIC DEFENDER  
CO-COUNSEL

BRANCH OFFICE OF THE OHIO PUBLIC DEFENDER  
328 Mahoning Avenue  
Warren, Ohio 44483  
(330)393-7727 FAX (330)393-7076

COUNSEL FOR NATHANIEL JACKSON

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the forgoing DEFENDANT'S DEMAND FOR DISCOVERY was delivered to the Trumbull County Prosecutor's Office, 160 High Street, Warren, Ohio 44481, on this 7th day of January, 2002.

  
\_\_\_\_\_  
ANTHONY V. CONSOLDANE  
COUNSEL FOR DEFENDANT



3

IN THE COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO

STATE OF OHIO,	)	Case No. 01-CR-794
	)	
Plaintiff,	)	
VS.	)	
	)	
NATHANIEL JACKSON ,	)	Judge Stuard
	)	
Defendant.	)	

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DEFENDANT'S MOTION FOR APPOINTMENT OF  
INVESTIGATOR AND MITIGATION SPECIALIST

Now comes Defendant NATHANIEL JACKSON, by and through his Attorneys, and moves this Court for an Order authorizing the appointment of an investigator and a mitigation specialist pursuant to Ohio Revised Code Ann. § 2929.024 (Anderson 1996). Said appointment is allowed by law and required and reasonably necessary for the proper representation of NATHANIEL JACKSON. Support for this motion is provided in the attached memorandum.

Respectfully submitted,

*David H. Bodiker / DJF*

DAVID H. BODIKER #0016590  
OHIO PUBLIC DEFENDER

*Anthony V. Consoldane*

ANTHONY V. CONSOLDANE #0000761  
ASSISTANT STATE PUBLIC DEFENDER  
LEAD COUNSEL

*James F. Lewis*

JAMES F. LEWIS #0024314  
ASSISTANT STATE PUBLIC DEFENDER  
CO-COUNSEL

90



BRANCH OFFICE OF THE OHIO PUBLIC DEFENDER  
328 Mahoning Avenue  
Warren, Ohio 44483  
(330)393-7727 FAX (330)393-7076

MEMORANDUM IN SUPPORT

NATHANIEL JACKSON stands before this Court charged with one count of Aggravated Murder with specifications of Aggravated Circumstances, one count of Aggravated Murder with specifications of Aggravated Circumstances, one count of Aggravated Burglary with Firearm Specifications, and one count of Aggravated Robbery with Firearm Specifications, NATHANIEL JACKSON faces a possible sentence of death.

An integral duty of counsel representing capital defendants is not only to investigate all aspects of the crime, but also to thoroughly investigate all avenues of mitigation. See Strickland v. Washington, 466 U.S. 668, 691 (1984); Glenn v. Tate, 71 F.3d 1204 (1995), cert. denied 117 S. Ct. 273 (1996). See also State v. Johnson, 24 Ohio St. 3d 87, 88, 494 N.E.2d 1061, 1063 (1986). In order to comply with counsels' ethical duties and to protect NATHANIEL JACKSON's rights to a fair trial, this Court must grant the resources necessary to prepare [his/her] defense. Ake v. Oklahoma, 470 U.S. 68 (1985).

In a capital case, the defendant's mental state and psycho-social history are always significant issues as O.R.C. § 2929.04 (B)(3) specifically states that a mental disease or defect is a mitigating factor. Under O.R.C. § 2929.04 (B)(7), any other factor concerning the defendant's life may also be

mitigating. It is error to deny funds for psychiatric assistance when the such evidence concerns a significant issue, and is needed to enhance the defendant's case during the sentencing phase of a capital trial. Tuggle v. Netherland, \_\_\_ U.S. \_\_\_, 116 S. Ct. 283, 285 (1995) (per curiam); Ake, 470 U.S. at 83.

O.R.C. § 2929.024 provides for the appropriation of funds for experts and investigative services for indigent persons charged with capital crimes. These funds are available for both the trial phase and the sentencing phase of the proceedings. State v. Jenkins, 15 Ohio St. 3d 164

(1984). C.P. Sup. R. 65 (D) instructs the court to:  
provide appointed counsel, as required by Ohio law or the federal Constitution, federal statutes, and professional standards, with the investigator, mitigation specialists, mental health professional, ... and other support services reasonably necessary or appropriate for counsel to prepare for and present an adequate defense at every stage of the proceedings....

In this case, it is reasonably necessary to conduct psychological tests and interviews of NATHANIEL JACKSON in order to prepare for both the trial phase and the sentencing phase of the proceedings. It is also reasonably necessary to investigate the circumstances surrounding the crime in preparation for a defense. Counsel is unable to assess NATHANIEL JACKSON's psychological status and prepare an adequate defense without the assistance of an investigator and a mitigation specialist.

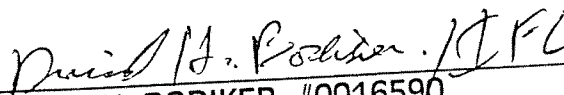
It is essential that counsel for NATHANIEL JACKSON prepare, investigate, and develop a theory of mitigation in case this matter proceeds to a capital sentencing trial. It is necessary to conduct social history interviews; educational, employment, legal, human services,

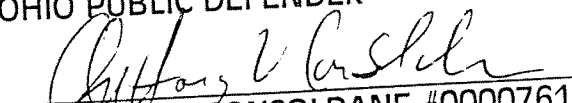
psychological, and medical records reviews; interviews with family and friends, neighbors, teachers, human service workers, coaches, doctors, and other people who can give insight into NATHANIEL JACKSON's life and history; consult with experts; and interview NATHANIEL JACKSON in order to prepare for both the trial and sentencing phases of the proceedings. Counsel is unable to investigate and develop a theory of mitigation for NATHANIEL JACKSON without the assistance of a mitigation specialist.

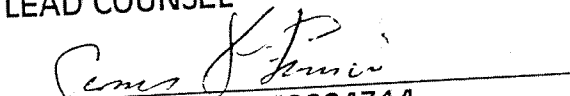
Counsel proposes to utilize Dr. Sandra McPherson, Ph.D. and Donald McPherson, M.Ed. at the rate of \$150.00 per hour for Dr. McPherson and \$90.00 per hour for Donald McPherson.

Therefore, counsel requests authorization to retain Dr. McPherson and her investigator for approximately six thousand five-hundred dollars (\$6,500.00) plus expenses.

Respectfully submitted,

  
DAVID H. BODIKER #0016590  
OHIO PUBLIC DEFENDER

  
ANTHONY V. CONSOLDANE #0000761  
ASSISTANT STATE PUBLIC DEFENDER  
LEAD COUNSEL

  
JAMES F. LEWIS #0024314  
ASSISTANT STATE PUBLIC DEFENDER  
CO-COUNSEL

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